

**THE PROSECUTOR OF THE TRIBUNAL
AGAINST
VOJISLAV SESELJ**

INDICTMENT

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

VOJISLAV SESELJ

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

THE ACCUSED

1. Vojislav SESELJ, son of Nikola SESELJ, was born on 11 October 1954 in Sarajevo, Republic of Bosnia and Herzegovina ("Bosnia and Herzegovina"). He is a graduate of the faculty of law of Sarajevo University. He holds a Bachelor's Degree, a Masters Degree and a Doctorate obtained in 1976, 1978 and 1979 respectively. From 1981 to 1984 he worked as an assistant professor lecturing on political science at Sarajevo University.

2. Although he was originally a communist, **Vojislav SESELJ** eventually became critical of the communist regime in the former Yugoslavia and in the early 1980s he developed close relations with a group of Serbian nationalists. In 1984 he was convicted of "counter-revolutionary activities" and sentenced to eight years of imprisonment. Upon the commutation of the sentence by the Supreme Court of the Socialist Federal Republic of Yugoslavia ("SFRY") he was released in 1986.

3. After his release **Vojislav SESELJ** settled down in Belgrade and continued to engage in nationalistic politics. In 1989 he travelled to the USA and met the chairman of the "Movement of Chetniks in the Free World", Momcilo Dujic, who on the day of the 600th anniversary of the Battle of Kosovo - 28 June 1989 – appointed him a Chetnik "Vojvoda", meaning a "Duke" or leader. Following this appointment **Vojislav SESELJ** travelled in the USA, Canada, Australia and Western Europe collecting funds to support his nationalistic activities. On 23 January 1990, **Vojislav SESELJ** became the leader of the Serbian Freedom Movement and on 14 March 1990, formed an alliance with Vuk Draskovic, another Serbian nationalist, and started the "Serbian Renewal Movement" ("SPO").

4. In June 1990 **Vojislav SESELJ** founded the "Serbian National Renewal Party", subsequently

renamed the "Serbian Chetnik Movement". In the elections of December 1990 his party received almost 100,000 votes. Shortly thereafter, the authorities of the SFRY banned the "Serbian Chetnik Movement". On 23 February 1991, **Vojislav SESELJ** was appointed President of the newly founded "Serbian Radical Party" ("SRS"). In June 1991, he was elected a member of the Assembly of the Republic of Serbia. In almost daily rallies and election campaigns, he called for Serb unity and war against Serbia's "historic enemies", namely the ethnic Croat, Muslim and Albanian populations within the territories of the former Yugoslavia. Additional relevant historical and political facts are set out in Annex I to this indictment.

INDIVIDUAL CRIMINAL RESPONSIBILITY

Article 7(1) of the Statute of the Tribunal

5. Vojislav SESELJ is individually criminally responsible for the crimes referred to in Articles 3 and 5 of the Statute of the Tribunal and described in this indictment, which he planned, ordered, instigated, committed or in whose planning, preparation, or execution he otherwise aided and abetted. By using the word "committed" in this indictment, the Prosecutor does not intend to suggest that the accused physically committed all of the crimes charged personally. "Committed" as used in this indictment includes the participation of **Vojislav SESELJ** in a joint criminal enterprise. By using the word "instigated", the Prosecution charges that the accused **Vojislav SESELJ's** speeches, communications, acts and/or omissions contributed to the perpetrators' decision to commit the crimes alleged.

6. Vojislav SESELJ participated in a joint criminal enterprise. The purpose of this joint criminal enterprise was the permanent forcible removal, through the commission of crimes in violation of Articles 3 and 5 of the Statute of the Tribunal, of a majority of the Croat, Muslim and other non-Serb populations from approximately one-third of the territory of the Republic of Croatia ("Croatia"), and large parts of Bosnia and Herzegovina, and from parts of Vojvodina, in the Republic of Serbia ("Serbia"), in order to make these areas part of a new Serb-dominated state. With respect to Croatia the areas included those regions that were referred to by Serb authorities as the "SAO Krajina" (i.e. the Serb Autonomous Region of Krajina), the "SAO Western Slavonia", and the "SAO Slavonia, Baranja and Western Srem" (after 19 December 1991, the "SAO Krajina" became known as the RSK ("Republic of Serbian Krajina"); on 26 February 1992, the "SAO Western Slavonia" and the "SAO Slavonia, Baranja and Western Srem" joined the RSK), as well as the "Dubrovnik Republic /*Dubrovačka republika*". With respect to Bosnia and Herzegovina, the areas included Bosanski Samac and Zvornik.

7. The crimes enumerated in this indictment were within the object of the joint criminal enterprise and **Vojislav SESELJ** had the knowledge and intention necessary for the commission of each of the crimes. Alternatively, the crimes enumerated in Counts 1 to 9 and 12 to 15 of the indictment were the natural and foreseeable consequences of the execution of the object of the joint criminal enterprise and **Vojislav SESELJ** was aware that such crimes were the possible outcome of the execution of the joint criminal enterprise.

8. The aforesaid joint criminal enterprise came into existence before 1 August 1991 and continued at least until December 1995. **Vojislav SESELJ** participated in the joint criminal enterprise until September 1993 when he had a conflict with Slobodan Milosevic. **Vojislav SESELJ** worked in concert with several individuals in the joint criminal enterprise to succeed in its objective. Each participant or co-perpetrator within the joint criminal enterprise played his or her role or roles that significantly contributed to the objective of the enterprise. Other individuals participating in this joint criminal enterprise included Slobodan MILOSEVIC, General Veljko KADIJEVIC, General Blagoje ADZIC, Colonel Ratko MLADIC, Jovica STANISIC, Franko SIMATOVIC also known as

"Frenki", Radovan STOJICIC, also known as "Badza", Milan MARTIC, Goran HADZIC, Radovan KARADZIC, Momcilo KRAJISNIK, Biljana PLAVSIC, Zeljko RAZNATOVIC, also known as "Arkan", and other members of the Yugoslav People's Army ("JNA"), later the Yugoslav Army ("VJ"), the newly-formed Serb Territorial Defence ("TO") of Croatia and of Bosnia and Herzegovina, the army of the *Republika Srpska Krajina* ("SVK") and the army of the *Republika Srpska* ("VRS"), and the TOs of Serbia and of Montenegro, local Serb, Republic of Serbia and Republika Srpska police forces ("MUP forces"), including the State Security/*Drzavna bezbednost* ("DB") Branch of the Ministry of Interior of the Republic of Serbia, and Serb special police forces of the SAO Krajina and the RSK commonly referred to as "Martic's Police", *Marticevci*, "SAO Krajina Police" or "SAO Krajina Milicija" (hereinafter "Martic's Police") and members of Serbian, Montenegrin, Bosnian and Croatian Serb paramilitary forces and volunteer units including "Chetniks", or "Seseljevci" (translated into English as "Seselj's men") (collectively, "Serb forces"), and other political figures from the (S)FRY, the Republic of Serbia, the Republic of Montenegro and the Bosnian and Croatian Serb leadership.

9. Vojislav SESELJ, as President of the SRS, was a prominent political figure in the SFRY/FRY in the time period relevant to this indictment. He propagated a policy of uniting "all Serbian lands" in a homogeneous Serbian state. He defined the so-called Karlobag-Ogulin-Karlovac-Virovitica line as the western border of this new Serbian state (which he called "Greater Serbia") which included Serbia, Montenegro, Macedonia and considerable parts of Croatia and Bosnia and Herzegovina.

10. Vojislav SESELJ, acting alone and in concert with other members of the joint criminal enterprise, participated in the joint criminal enterprise in the following ways:

- a. He participated in the recruitment, formation, financing, supply, support and direction of Serbian volunteers connected to the SRS, commonly known as "Chetniks", or "Seseljevci". These volunteer units were created and supported to assist in the execution of the joint criminal enterprise through the commission of crimes in violation of Articles 3 and 5 of the Statute of the Tribunal.
- b. He made inflammatory speeches in the media, during public events, and during visits to the volunteer units and other Serb forces in Croatia and Bosnia and Herzegovina, instigating those forces to commit crimes in violation of Articles 3 and 5 of the Statute of the Tribunal.
- c. He espoused and encouraged the creation of a homogeneous "Greater Serbia", encompassing the territories specified in this indictment, by violence, and thereby participated in war propaganda and incitement of hatred towards non-Serb people.
- d. In public speeches he called for the expulsion of Croat civilians from parts of the Vojvodina region in Serbia and thus instigated his followers and the local authorities to engage in a persecution campaign against the local Croat population.
- e. He participated in the planning and preparation of the take-over of villages in two SAOs in Croatia and in the municipalities of Bosanski Samac and Zvornik in Bosnia and Herzegovina and the subsequent forcible removal of the majority of the non-Serb population from these areas.
- f. He participated in the provision of financial, material, logistical and political support necessary for such take-overs. He obtained this support, with the help of Slobodan Milosevic, from the Serbian authorities and from Serbs living abroad where he collected funds to support the aim of the joint criminal enterprise.

- g. He recruited Serbian volunteers connected to the SRS and indoctrinated them with his extreme ethnic rhetoric so that they engaged in the forcible removal of the non-Serb population in the targeted territories through the commission of crimes as specified in this indictment with particular violence and brutality.

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

GENERAL LEGAL ALLEGATIONS

12. At all times relevant to this indictment, a state of armed conflict existed in Croatia and Bosnia and Herzegovina. A nexus existed between this state of armed conflict and the alleged crimes in Croatia, Bosnia and Herzegovina, and parts of Vojvodina, Serbia.

13. At all times relevant to this indictment, **Vojislav SESELJ** was required to abide by the laws and customs governing the conduct of armed conflicts.

14. Conduct charged as crimes against humanity was part of a widespread or systematic attack directed against the Croat, Muslim and other non-Serb civilian populations within large areas of Croatia, Bosnia and Herzegovina and Vojvodina, Serbia.

THE CHARGES:

COUNT 1 (PERSECUTIONS)

15. From on or about 1 August 1991 until at least September 1993, **Vojislav SESELJ**, acting individually or in concert with known and unknown members of the joint criminal enterprise, planned, ordered, instigated, committed or otherwise aided and abetted in the planning, preparation or execution of persecutions of Croat, Muslim and other non-Serb civilian populations in the territories of the SAO Western Slavonia and the SAO SBWS (Slavonia, Baranja and Western Srem), and in the municipalities of Bosanski Samac and Zvornik in Bosnia and Herzegovina and parts of Vojvodina in Serbia.

16. Throughout this period, Serb forces, comprising JNA (and subsequently the VJ) units, local Serb TO units (which were subsequently transformed into the army of the RSK ("SVK") and the army of the *Republika Srpska* ("VRS")), and TO units from Serbia and Montenegro, local Serb and Republic of Serbia MUP police units and volunteer and paramilitary units, including the volunteers recruited and/or instigated by **Vojislav SESELJ**, attacked and took control of towns and villages in these territories. After the take-over, these Serb forces, in co-operation with the local Serb authorities, established a regime of persecutions designed to drive the non-Serb civilian population from these territories.

17. These persecutions were committed on political, racial and religious grounds and included:

- a. The extermination or murder of many Croat, Muslim and other non-Serb civilians, including women and elderly persons, in the municipality of Vukovar and the villages of Vocin, Hum, Bokane and Kraskovic in Croatia, in the municipalities of Bosanski Samac and Zvornik in Bosnia and Herzegovina, as described in detail in paragraphs 18 to 23.
- b. The prolonged and routine imprisonment and confinement of Croat, Muslim and other non-Serb civilians in the detention facilities within Croatia and Bosnia and Herzegovina, including prison camps in Vukovar, in and near Vocin, and in Bosanski Samac and Zvornik, as described in detail in paragraphs 24 to 26.
- c. The establishment and perpetuation of inhumane living conditions for Croat, Muslim and other non-Serb civilian detainees within the detention facilities referred to.
- d. The repeated torture, beatings and killings of Croat, Muslim and other non-Serb civilian detainees in the said detention facilities.
- e. The prolonged and frequent forced labour of Croat, Muslim and other non-Serb civilians detained in the said detention facilities or under house arrest in their respective homes in Vukovar, Vocin, Bosanski Samac and Zvornik. The forced labour included digging of graves, loading of ammunition for the Serb forces, digging of trenches and other forms of manual labour at the frontlines.
- f. The sexual assaults of Croat, Muslim and other non-Serb civilians by Serb soldiers during capture and in the detention facilities.
- g. The imposing of restrictive and discriminatory measures against the Croat, Muslim and other non-Serb civilian populations, including persons in Vocin in Croatia and Bosanski Samac and Zvornik in Bosnia and Herzegovina, and in parts of Vojvodina, Serbia, such as restriction of movement; removal from positions of authority in local government institutions and the police; dismissal from jobs; denial of medical care, and arbitrary searches of homes.
- h. The torture, beating and robbing of Croat, Muslim and other non-Serb civilians.
- i. The deportation or forcible transfer of tens of thousands of Croat, Muslim and other non-Serb civilians from the territories as specified above, and from parts of Vojvodina, Serbia as described in detail in paragraphs 27 to 29.
- j. The deliberate destruction of homes, other public and private property, cultural institutions, historic monuments and sacred sites of the Croat, Muslim and other non-Serb civilian populations in the municipality of Vukovar and in Vocin, in Croatia, and in the municipalities of Bosanski Samac and Zvornik in Bosnia and Herzegovina as described in detail in paragraph 31.

By his participation in these acts, **Vojislav SESELJ** committed:

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

COUNTS 2 to 4
(EXTERMINATION and MURDER)

18. From on or about 1 August 1991 until June 1992 in the territory of the SAO SBWS in Vukovar and the SAO Western Slavonia in Vocin, from on or about 1992 until at least September 1993 in the municipality of Zvornik in Bosnia and Herzegovina, and from on or about 1 April 1992 until at least 1 September 1993 in the municipality of Bosanski Samac in Bosnia and Herzegovina, **Vojislav SESELJ**, acting individually or in concert with other known and unknown members of a joint criminal enterprise, planned, ordered, instigated, committed or otherwise aided and abetted in the planning, preparation, or execution of the extermination and murder of Croat, Muslim and other non-Serb civilians as specified in paragraphs 19 to 23 of this indictment.

CROATIA

SAO WESTERN SLAVONIA

19. Beginning in August 1991, Serb forces including the volunteer units known as "Seselj's men" were in control of Vocin. In November 1991 **Vojislav SESELJ** visited Vocin and addressed the volunteers. Incited by **Vojislav SESELJ**'s speeches, the volunteer units, in particular "Seselj's men", started burning houses of Croat citizens and killing Croat civilians in the villages of Vocin, Hum, Bokane and Kraskovic until their withdrawal from the region on 13 December 1991. They went from house to house and killed whomever they found, in total **forty-three** civilians. Some of those who hid survived. The names of the victims are set out in Annex II attached to this indictment.

SAOSBWS - VUKOVAR

20. In November 1991 while Serb forces fought to take over Vukovar, **Vojislav SESELJ** visited the town and publicly pronounced "Not one Ustasha must leave Vukovar alive", thus instigating the killing of Croats. On or about 20 November 1991, as part of the overall persecution campaign, Serb military forces including members of the JNA and TO and volunteer and paramilitary forces under the command, control or influence of the JNA, the TO SBWS and other participants of the joint criminal enterprise, including volunteers recruited and/or incited by **Vojislav SESELJ**, removed approximately four hundred Croats and other non-Serbs from Vukovar Hospital in the aftermath of the Serb take-over of the city. Approximately three hundred of these non-Serbs were transported to the JNA barracks and then to the Ovcara farm located about 5 kilometres south of Vukovar. There, members of the Serb forces beat and tortured the victims for hours. During the evening of 20 November 1991, the soldiers transported the victims in groups of 10-20 to a remote execution site between the Ovcara farm and Grabovo, where they shot and killed approximately **two hundred and fifty-five** non-Serbs from Vukovar Hospital. Their bodies were buried in a mass grave. The names of the murder victims are set out in Annex III attached to this indictment.

21. After Serb forces took control of Vukovar on 18 November 1991, over one thousand civilians gathered at the Velepromet facility. Some were compelled to go there by Serb forces and others went voluntarily seeking protection. By 19 November 1991, approximately two thousand people were gathered inside the Velepromet facility. The JNA considered about eight hundred of these persons to be prisoners of war. By the evening of 19 November 1991, shortly after the JNA began to transfer the alleged prisoners of war to their Sremska Mitorovica detention facility in Serbia, Serb forces, including volunteers recruited and/or incited by **Vojislav SESELJ**, separated a number of individuals from the alleged group of prisoners of war. They took these selected individuals out of the Velepromet facility and killed them. The bodies of some of those killed were transported to the Ovcara farm and buried there in the mass grave while the bodies of six other victims were left lying

on the ground behind the Velepromet facility. The names of these six victims are set out in Annex IV attached to this indictment.

BOSNIA and HERZEGOVINA

ZVORNIK

22. In March 1992, Vojislav **SESELJ** gave a speech at a rally in Mali Zvornik, located across the Drina river from Zvornik. Vojislav **SESELJ** said: "Dear Chetnik brothers, especially you across the Drina river, you are the bravest ones. We are going to clean Bosnia of pagans and show them a road which will take them to the east, where they belong", thus instigating the persecution of non-Serbs in Zvornik. In April 1992, Serb forces, including volunteers known as "Seselj's men" and "Arkan's tigers", attacked and took control of the town of Zvornik and surrounding villages. During the attack, Serb forces killed many non-Serb civilians. On or about 9 April 1992, members of Arkan's unit executed twenty Bosnian Muslim and Croat men and boys in Zvornik town. Following the take-over, non-Serbs were routinely detained, beaten, tortured and killed. Hundreds of non-Serb civilians were detained in or near Zvornik from April to July 1992 in the "Standard" shoe factory, the "Ciglana" factory, the Ekonomija farm, the Novi Izvor building and the Celopek Dom Kulture. On or about 12 May 1992, at the Ekonomija farm, Serb forces, including the leader of a group of "Seselj's men", beat to death a detainee named Nesib Dautovic. In May 1992, Serb forces killed two non-Serb male detainees at the Novi Izvor building. Between 1 and 5 June 1992, Serb forces killed more than 150 Bosnian Muslim males at Karakaj Technical School. Between 7 and 9 June 1992, Serb forces killed more than 150 detainees at Gero's slaughter-house. Serb forces killed more than forty non-Serb male detainees between 1 and 26 June 1992 at Celopek Dom Kulture. The names of the identified victims at Karakaj Technical School, Gero's slaughter-house and Celopek Dom Kulture are set out in Annex V to this indictment.

BOSANSKI SAMAC

23. In April 1992, Serb forces, including volunteers known as "Seselj's men", attacked and took control of the town of Bosanski Samac and surrounding villages. Following the take-over, hundreds of non-Serbs were routinely detained, beaten and tortured in the police headquarters building ("SUP"), the Territorial Defence building ("TO"), the primary and secondary schools, as well as the warehouse of the agricultural co-operative located in Crkvina, to the south-west of the town of Bosanski Samac, and dozens were killed. On or about 7 May 1992, two leaders of a unit of "Seselj's men" shot and killed eighteen men and boys in the warehouse of the agricultural co-operative in Crkvina. The names of the victims at Crkvina are set out in Annex VI to this indictment.

By his participation in these acts, **Vojislav SESELJ** committed:

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

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

Count 4: Murder, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Common Article 3(1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) of the Statute of the Tribunal.

COUNTS 5 to 9

(IMPRISONMENT, TORTURE, OTHER INHUMANE ACTS and CRUEL TREATMENT)

24. From August 1991 until September 1992 **Vojislav SESELJ**, acting individually or in concert with other known and unknown members of a joint criminal enterprise, planned, ordered, instigated, committed or otherwise aided and abetted in the planning, preparation or execution of the imprisonment under inhumane conditions of Muslim, Croat and other non-Serb civilians in the territories listed above.

25. Serb military forces, comprising JNA (and subsequently the VJ), Croatian and Bosnian Serb TO units (which were subsequently transformed into the army of the RSK ("SVK") and the army of the Republika Srpska ("VRS")), volunteer and paramilitary units, including those volunteer units recruited and/or incited by **Vojislav SESELJ**, acting in co-operation with local police staff and local Serb authorities, captured and detained hundreds of Croat, Muslim and other non-Serb civilians. They were detained in the following short- and long-term detention facilities:

- a. The Velepromet warehouse, Vukovar, SAO SBWS, November 1991, run by JNA, approximately twelve hundred detainees.
- b. The Ovcara farm, near Vukovar, SAO SBWS, November 1991, run by JNA, approximately three hundred detainees.
- c. The basement of the bank building in Vocin in October 1991, several detainees.
- d. The "Lager Sekulinci" near Vocin in August 1991, three detainees.
- e. The "Standard" shoe factory, the "Ciglana" factory, the Ekonomija farm, the Novi Izvor building and the Celopek Dom Kulture in Zvornik, Bosnia and Herzegovina between April and July 1992, hundreds of detainees.
- f. The police headquarters building ("SUP"), the Territorial Defence building ("TO"), the primary and secondary schools in Bosanski Samac, and the warehouse in the agricultural co-operative in Crkvina, near Bosanski Samac, in Bosnia and Herzegovina, between April and September 1992, hundreds of detainees.

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

By his participation in these acts, **Vojislav SESELJ** committed:

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

Count 6: Torture, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(f) and 7(1) of the Statute of the Tribunal.

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

Count 8: Torture, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR** as recognised by Common Article 3(1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) of the Statute of the Tribunal.

Count 9: Cruel Treatment, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR** as recognised by Common Article 3(1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) of the Statute of the Tribunal.

COUNTS 10 to 11
(DEPORTATION, FORCIBLE TRANSFER)

27. From on or about 1 August 1991 until May 1992 in the SAOs in Croatia and the RSK, from on or about 1 March 1992 until at least September 1993 in Bosnia and Herzegovina, and in May 1992 in parts of Vojvodina, Serbia, **Vojislav SESELJ**, acting individually or in concert with other known and unknown members of the joint criminal enterprise, planned, instigated, committed, or otherwise aided and abetted in the planning, preparation, or execution of the deportation or forcible transfer of the Croat, Muslim and other non-Serb civilian populations from their legal domiciles, in Vukovar (SAO SBWS) in November 1991 and in Vocin (SAO Western Slavonia) in November and December 1991, in the municipality of Zvornik in Bosnia and Herzegovina between March 1992 and September 1993, in the municipality of Bosanski Samac in Bosnia and Herzegovina between April 1992 and September 1993, and in parts of Vojvodina, Serbia, including the village of Hrtkovci, in May 1992.

28. In order to achieve this objective, Serb forces comprising JNA (and subsequently the VJ), local Croatian and Bosnian Serb TO units (which were subsequently transformed into the army of the RSK ("SVK") and the army of the *Republika Srpska* ("VRS")) and those from the Republic of Serbia and Montenegro, and volunteers and paramilitaries, including the "White Eagles" and "Dusan Silni", as well as volunteers recruited and/or incited by **Vojislav SESELJ**, in co-operation with local and Serbian police units, surrounded Croatian and Bosnian towns and villages and demanded that the inhabitants surrender their weapons, including legally owned hunting rifles. Then, the towns and villages were attacked or otherwise taken-over, even those where the inhabitants had complied with the demands. These attacks were intended to compel the population to flee. After taking control of the towns and villages, the Serb forces sometimes rounded up the remaining Croat, Muslim and other non-Serb civilian populations and forcibly transported them to locations within Croatia or Bosnia and Herzegovina not controlled by Serbs, or deported them to locations outside Croatia or Bosnia and Herzegovina, in particular Serbia and Montenegro. On other occasions, Serb forces, in co-operation with the local Serb authorities, imposed restrictive and discriminatory measures on the non-Serb population and engaged in a campaign of terror designed to drive them out of the territory. The majority of the non-Serbs that remained were deported or forcibly transferred from their homes on a later date.

29. In May 1992, **Vojislav SESELJ** came to Vojvodina and met with his associates in the SRS. **Vojislav SESELJ** instructed his associates to contact non-Serbs and threaten them with death if they did not leave the area. On 6 May 1992 **Vojislav SESELJ** gave an inflammatory speech in the village of Hrtkovci, Vojvodina, calling for the expulsion of Croats from the area and reading a list of individual Croat residents who should leave for Croatia. After this speech, a campaign of ethnic cleansing directed at non-Serbs, particularly Croats, began in Hrtkovci. During the next three months, many non-Serbs were harassed, threatened with death and intimidated, forcing them to leave the area. Homes of Croats were looted and occupied by Serbs. Serb families who had been displaced from other parts of the former Yugoslavia often occupied the homes of those non-Serbs

who were compelled to leave.

30. By his participation in these acts, Vojislav SESELJ committed:

Count 10: Deportation, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(d) and 7 (1) of the Statute of the Tribunal.

Count 11: Inhumane Acts (Forcible Transfers), a **CRIME AGAINST HUMANITY**, punishable under Articles 5(i) and 7(1) of the Statute of the Tribunal.

COUNTS 12 to 15
(WANTON DESTRUCTION, PLUNDER OF PUBLIC OR PRIVATE PROPERTY and
UNLAWFUL ATTACKS ON CIVILIAN OBJECTS)

31. From on or about 1 August 1991 until May 1992 in the territories of the SAOs in Croatia and the RSK, from on or about 1 March 1992 until at least September 1993 in the municipality of Zvornik in Bosnia and Herzegovina, and from on or about 1 April 1992 until at least September 1993 in the municipality of Bosanski Samac in Bosnia and Herzegovina, **Vojislav SESELJ**, acting individually or in concert with other known and unknown members of the joint criminal enterprise, planned, ordered, instigated, committed, or otherwise aided and abetted in the planning, preparation, or execution of the wanton destruction and plunder of public and private property of the Croat, Muslim and other non-Serb populations, acts which were not justified by military necessity. This intentional and wanton destruction and plunder included the plunder and destruction of homes and religious and cultural buildings, and took place in the following towns and villages:

SAO SBWS: Vukovar; (hundreds of homes destroyed)

SAO Western Slavonia: Vocin and Hum; (dozens of homes and a Catholic church destroyed) and

Bosnia and Herzegovina: Bosanski Samac (hundreds of homes and a mosque destroyed) and Zvornik (hundreds of homes and dozens of mosques destroyed).

32. By his participation in these acts, Vojislav SESELJ committed:

Count 12: Wanton destruction of villages, or devastation not justified by military necessity, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(b) and 7 (1) of the Statute of the Tribunal.

Count 13: Destruction or wilful damage done to institutions dedicated to religion or education, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(d) and 7 (1) of the Statute of the Tribunal.

Count 14: Plunder of public or private property, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(e) and 7(1) of the Statute of the Tribunal.

Dated this Fifteenth Day of January 2003
In The Hague
The Netherlands

ANNEX I

ADDITIONAL HISTORICAL AND POLITICAL FACTS

Croatia

1. In advance of the 1990 elections, the nationalistic Serbian Democratic Party ("SDS"), which advocated the autonomy and later secession of predominately-Serb areas from Croatia, was founded in Knin. **Vojislav SESELJ** maintained contact with the leaders of the SDS. He attended meetings of the SDS and took part in SDS political events.
2. On 25 July 1990, a group of SDS leaders established the Serbian National Council ("SNC"), adopting a Declaration on Autonomy and the Position of Serbs in Croatia, and on the Sovereignty and Autonomy of the Serbian Nation.
3. On 30 July 1990, during the SNC's first constituent session, a referendum, which would confirm the autonomy and sovereignty of the Serb nation in Croatia, was scheduled.
4. On 17 August 1990, Serbs in Knin put up barricades after the Croatian government declared the referendum illegal.
5. Between 19 August and 2 September 1990, Croatian Serbs held a referendum on the issue of Serb "sovereignty and autonomy" in Croatia. The vote took place in predominately Serb areas of Croatia and was limited only to Serb voters. Croats who lived in the affected region were barred from participating in the referendum. The result of the vote was overwhelmingly in support of Serb autonomy. On 30 September 1990, the SNC declared "the autonomy of the Serbian people on ethnic and historic territories on which it lives and which are within the current boundaries of the Republic of Croatia as a federal unit of the Socialist Federal Republic of Yugoslavia".
6. On 21 December 1990, Croatian Serbs in Knin announced the creation of a "Serbian Autonomous District" (SAO) of Krajina and subsequently declared their independence from Croatia.
7. On 7 January 1991, the Serbian National Council (SNC) for Slavonia, Baranja and Western Srem ("SBWS") was formed in Sidski Banovci.
8. Conflicts between armed Serbs and Croatian police forces erupted throughout the Spring of 1991.
9. In March 1991, the conflict intensified with clashes in Pakrac and Plitvice. At Plitvice on 31 March 1991, Serbs attacked a bus carrying Croatian policemen and another battle erupted. The JNA deployed troops in the area and issued an ultimatum to the Croatian police to withdraw from Plitvice. **Vojislav SESELJ** and some of his volunteers took part in the events in Plitvice, SAO Krajina. In discussions with the JNA officers he introduced himself as "Vojvoda". He made extreme

nationalistic speeches inciting the local population to engage in violence against the Croatian police.

10. On 1 April 1991, the Executive Council of the SAO Krajina adopted a resolution to incorporate the SAO Krajina into the Republic of Serbia. At the same time the SAO Krajina recognised the constitution and laws of Serbia as well as the SFRY constitutional-legal system and decided that the laws and regulations of Serbia applied throughout the territory.

11. In the end of April 1991, armed local Serbs assisted by Seselj's men and other Serbian volunteers erected barricades in the village of Borovo Selo near Vukovar. On 1 May 1991, these armed Serbs took hostage a number of Croatian policemen who were sent to restore law and order in Borovo Selo. On 2 May, the Croatian police authorities in Osijek sent a larger group of heavily armed policemen to Borovo Selo to free the hostages. Local armed Serbs assisted by Seselj's men and other Serbian volunteers ambushed this group of policemen. Twelve Croatian policemen were killed and twenty injured in the fighting.

12. On 12 May 1991, a referendum was held in the SAO Krajina, Slavonia, Baranja and Western Srem concerning the annexation of these regions to Serbia and the consolidation of these regions in Yugoslavia with Serbia, Montenegro and others that wished to preserve Yugoslavia. The annexation was supported by 99.8% of those who voted.

13. On 19 May 1991, Croatia held a referendum in which the electorate voted overwhelmingly for independence from the SFRY. On 25 June 1991, Croatia and the Republic of Slovenia declared their independence from the SFRY. On 25 June 1991, the JNA moved to suppress Slovenia's secession.

14. On 25 June 1991, the "Great National Assembly of SBWS" was formed in Backa Palanka, Serbia at a meeting attended by representatives of all the Serb villages in the SBWS. The Great National Assembly decided that the region of SBWS was to be constituted as SAO SBWS and was to secede from Croatia. Goran Hadzic, until then President of the SNC, was elected Prime Minister designate.

15. The European Community sought to mediate in the conflict. On 8 July 1991, an agreement was reached that Croatia and Slovenia would suspend implementation of their independence until 8 October 1991. The European Community ultimately recognised Croatia as an independent state on 15 January 1992.

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

17. The Serbs in the Krajina region, in Eastern Slavonia and in Western Slavonia, began receiving increasing support from the government of Serbia and the JNA. By August 1991, local Serb Territorial Defence, volunteer and police forces in these regions were being supplied, trained and partly led by the JNA and officials of the Serbian MUP. Throughout August and September 1991, large areas in Croatia came under Serb control as a result of actions by Serb military forces, including "Seselj's men", the "White Eagles", and police forces.

18. During this period **Vojislav SESELJ** constantly appealed to the public to join the war effort. He visited the frontlines on numerous occasions and held meetings with the local Serb leaders.

19. In the Serb occupied regions in Krajina, Slavonia, Baranja and Western Srem, the Croatian and other non-Serb populations were systematically driven out and the areas were incorporated into the

various "Serbian Autonomous Districts" as specified above. The JNA remained deployed in the areas where the Serb insurgents had taken control, thereby securing their gains.

20. On 13 August 1991, the West Slavonian members of the presidency of the SDS of Slavonia held a session in Pakrac at which it was decided to declare the establishment of the "Serbian Autonomous District" ("SAO") Western Slavonia. The ethnic distribution of the population was used as the criteria for defining the territory of SAO Western Slavonia. The municipalities included in the SAO Western Slavonia were those whose representatives were present at the above session of the SDS Regional Board: Pakrac, Daruvar, Grubisno Polje, Podravska Slatina, Okucani, and parts of the Slavonska Pozega and Orahovica municipalities. In these areas Serbs represented 50% or more of the total population.

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

22. The siege of Vukovar continued until 18 November 1991 when the city fell to the Serb forces. During the course of the three-month siege, the city was largely destroyed by JNA shelling and hundreds of persons were killed. When the Serb forces occupied the city, hundreds of Croats were killed by Serb forces. Most of the non-Serb population of the city was expelled within days of its fall under Serb control.

23. In Geneva on 23 November 1991, Slobodan MILOSEVIC, Federal Secretary of People's Defence Veljko KADIJEVIC, and Franjo TUDMAN entered into an agreement signed under the auspices of the United Nations Special Envoy Cyrus VANCE. This agreement called for the lifting of blockades by Croatian forces on JNA barracks and for the withdrawal of JNA forces from Croatia. Both sides committed themselves to an immediate cease-fire throughout Croatia by units "under their command, control, or political influence" and further bound themselves to ensure that any paramilitary or irregular units associated with their forces would also observe the cease-fire.

24. On 19 December 1991, the SAO Krajina proclaimed itself the Republic of Serbian Krajina ("RSK") with Milan Babic as its first President. On 26 February 1992, the SAO Western Slavonia and SAO SBWS joined it in unilateral declarations by these entities.

25. Under the Vance Plan, three United Nations Protected Areas (UNPAs) were created (Krajina, Western Slavonia, SBWS), corresponding with four Sectors (South, North, West and East) in the areas occupied by Serb forces. The Vance Plan called for the withdrawal of the JNA from Croatia, the return of displaced persons to their homes in the UNPAs, and the demilitarisation of these UNPAs. Although the JNA officially withdrew from Croatia in May 1992, large portions of its weaponry and personnel remained in the Serb-held areas and were turned over to the "police" of the RSK. Displaced persons were not allowed to return to their homes and those few Croats and other non-Serbs who had remained in the Serb-occupied areas were expelled in the following months and years.

26. The Serb held territories in the RSK remained under Serb control until early May and early August 1995, respectively. In early May 1995, during Operation Flash, the Croatian authorities re-established control over Western Slavonia. In early August 1995, the Serb political and military

leadership left most of Croatian territory during a massive Croatian operation. This operation, commonly referred to as "Operation Storm", restored Croatian control over most of the RSK territory. The remaining areas of Serb control in Eastern Slavonia, Baranja and Western Srem were peacefully re-integrated into Croatia in 1998.

Bosnia and Herzegovina

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

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

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

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

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

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

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

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

- 35.** On 9 and 10 November 1991, the Bosnian Serbs held the plebiscite. The results overwhelmingly showed that the Bosnian Serbs wanted to stay in Yugoslavia.
- 36.** On 11 December 1991, the Assembly of the Serbian People made a request to the JNA to protect with all available means as "integral parts of the State of Yugoslavia" the territories of Bosnia and Herzegovina in which the plebiscite of the Serbian people and other citizens on remaining in a joint Yugoslav state had been conducted.
- 37.** On 9 January 1992, the Assembly of the Serbian People of Bosnia and Herzegovina adopted a declaration on the Proclamation of the Serbian Republic of Bosnia and Herzegovina. The territory of that republic was declared to include "the territories of the Serbian Autonomous Regions and Districts and of other Serbian ethnic entities in Bosnia and Herzegovina, including the regions in which the Serbian people remained in the minority due to the genocide conducted against it in World War Two", and it was declared to be a part of the federal Yugoslav state. On 12 August 1992, the name of the Bosnian Serb Republic was changed to Republika Srpska.
- 38.** From 29 February to 2 March 1992, Bosnia and Herzegovina held a referendum on independence. At the urging of the SDS, the majority of Bosnian Serbs boycotted the vote. The referendum resulted in a pro-independence majority.
- 39.** On 27 March 1992, the Serbian Republic of Bosnia and Herzegovina was formally proclaimed in Pale.
- 40.** From March 1992 onwards, Serb regular and irregular forces seized control of territories within Bosnia and Herzegovina, including those specified in this indictment.
- 41.** On 6 April 1992, the United States and the European Community formally recognized the independence of Bosnia and Herzegovina.
- 42.** On 27 April 1992, Serbia and Montenegro proclaimed a new Federal Republic of Yugoslavia and declared it the successor state of the Socialist Federal Republic of Yugoslavia.
- 43.** On 15 May 1992, the United Nations Security Council, in its resolution number 752, demanded that all interference from outside Bosnia and Herzegovina by units of the JNA as well as elements of the Croatian Army ("HV") cease immediately and that those units either be withdrawn, be subjected to the authority of the Government of the Republic, or be disbanded and disarmed.
- 44.** **Vojislav SESELJ** visited Bosnia and Herzegovina before and during the period of the armed conflict to boost the morale of the participants. In October 1991, he visited Serb soldiers in Trebinje gathered in preparation for the attack on Dubrovnik. In May and August 1992, he visited Gacko and Zvornik, respectively. In May 1993, he gave a speech in Banja Luka.
- 45.** In September 1993 **Vojislav SESELJ** had a conflict with Slobodan MILOSEVIC during which he challenged MILOSEVIC's leadership and called for a vote of "no confidence" in the government of Serbia. Between October and November 1993, dozens of **Vojislav SESELJ's** Chetnik volunteers were arrested in Serbia and charged with war crimes and other offences.
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ANNEX II

ANNEX FOR VICTIMS FROM VOCIN, HUM, BOKANE AND KRASKOVIC

PARAGRAPH 19

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
December 1991	VOCIN	SIMIC, Jaga	1929/FEMALE
		MATANCI, Marija	1939/FEMALE
		PERSIC, Franca	1928/FEMALE
		MEDIC, Branko	1959/MALE
		MATANCI, Stjepan	1932/MALE
		JURMANOVIC, Stjepan	1933/MALE
		STIMAC, Jakob	1911/MALE
		STIMAC, Angelina	1915/FEMALE
		BULJEVAC, Ante	1907/MALE
		TOMOLA, Rozalija	1921/FEMALE
		PERSIC, Alojzije	1922/MALE
		VOLF, Dragutin	1922/MALE
		IVANKOVIC, Marica	1930/MALE
		MATANCI, Franjo	1926/MALE
		MATANCI, Marija	1927/FEMALE
		MEDVED, Mirko	1929/MALE
		DORIC, Paulina	1911/FEMALE

	SIMIC, Julka	1932/FEMALE
	PAJTL, Josip	1965/MALE
	SIMIC, Ivan	1932/MALE
	SIMIC, Marija	1934/FEMALE
	AMENT, Veronika	1914/FEMALE
	STIMAC, Stjepan	1959/MALE
	BACIC, Mirjana	1963/FEMALE
	MAJDANCIC, Marija	1919/FEMALE
	MAJIC, Stipan	1909/MALE
	MAJIC, Ana	1918/FEMALE
	BON, Ivica	1954/MALE
	SALAC, Goran	1972/MALE
	SUPAN, Vlado	1959/MALE
	IVANKOVIC, Drago	1960/MALE

Plus one unidentified Deceased

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
December 1991	HUM	VUKOVIC, Marko	1934/MALE
		DUZEL, Marijan	1931/MALE
		RIDL, Roman	1932/MALE
		BANOVAC, Ivo	1934/MALE

December 1991	BOKANE	NENADOVIC, Stojan	1914/MALE
		MARTINKOVIC, Tomislav	1939/MALE
		MARTINKOVIC, Katica	1936/FEMALE
December 1991	KRASKOVIC	KOVAC, Zlatko	1966/MALE
		KOVAC, Duro	1922/MALE
		KOVAC, Ana	1927/FEMALE
		KOVAC, Pista	1953/MALE

ANNEX III.

VICTIMS FROM OVCARA FARM (VUKOVAR HOSPITAL)

PARAGRAPH 20

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVCARA	ADZAGA, Jozo	1949/MALE
		ANDRIJANIC, Vinko	1953/MALE
		ANIC-ANTIC, Jadranko	1959/MALE
		ARNOLD, Kresimir	1958/MALE
		ASADANIN, Ilija	1952/MALE
		BABIC, Drazen	1966/MALE
		BAINRAUCH, Ivan	1956/MALE
		BAJNRAUH, Tomislav	1938/MALE
		BAKETA, Goran	1960/MALE
		BALAS, Stjepan	1956/MALE
		BALOG, Dragutin	1974/MALE

BALOG, Josip	1928/MALE
BALOG, Zvonimir	1958/MALE
BALVANAC, Duro	1952/MALE
BANOZIC, Boris	1967/MALE
BARANJAJI, Pero	1968/MALE
BARBARIC, Branko	1967/MALE
BARBIR, Lovro	1935/MALE
BARICEVIC, Zeljko	1965/MALE
BARISIC, Franjo	1946/MALE
BARTA, Andjelko	1967/MALE
BATARELO, Josip	1947/MALE
BATARELO, Zeljko	1955/MALE
BAUMGERTNER, Tomislav	1972/MALE
BEGCEVIC, Marko	1968/MALE
BEGOV, Zeljko	1958/MALE
BINGULA, Stjepan	1958/MALE
BJELANOVIC, Ringo	1970/MALE
BLASKOVIC, Miroslav	1959/MALE
BLAZEVIC, Zlatko	1964/MALE
BODROZIC, Ante	1953/MALE
BOSAK, Marko	1967/MALE
BOSANAC, Dragutin	1919/MALE
	1941/MALE

		BOSANAC, Tomislav	1960/MALE
		BOSNJAKOV, Josip	

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVCARA	BOZAK, Ivan	1958/MALE
		BRACIC, Zvonimir	1970/MALE
		BRADARIC, Josip	1949/MALE
		BRAJDIC, Josip	1950/MALE
		BUOVAC, Ivan	1966/MALE
		BUZIC, Zvonko	1955/MALE
		CRNJAC, Ivan	1966/MALE
		CALETA, Zvonimir	1953/MALE
		COLAK, Ivica	1965/MALE
		CUPIC, Mladen	1967/MALE
		DALIC, Tihomir	1966/MALE
		DOLISNI, Ivica	1960/MALE
		DOSEN, Ivan	1958/MALE
		DOSEN, Martin	1952/MALE
		DOSEN, Tadija	1950/MALE
		DRAGUN, Josip	1962/MALE
DUVNJAK, Stanko	1959/MALE		
DUDAR, Sasa	1968/MALE		
DUKIC, Vladimir	1948/MALE		

		EBNER, Vinko-Duro	1961/MALE
		FIRI, Ivan	1915/MALE
		FITUS, Karlo	1964/MALE
		FRISCIC, Dragutin	1958/MALE
		FURUNDZIJA, Petar	1949/MALE
		GAJDA, Robert	1966/MALE
		GALIC, Milenko	1965/MALE
		GALIC, Vedran	1973/MALE
		GARVANOVIC, Borislav	1954/MALE
		GASPAR, Zorislav	1971/MALE
		GAVRIC, Dragan	1956/MALE
		GLAVASEVIC, Sinisa	1960/MALE
		GOJANI, Jozo	1966/MALE
		GOLAC, Krunoslav	1959/MALE
		GRAF, Branislav	1955/MALE
		GRANIC, Dragan	1960/MALE

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX

20 November 1991	OVCARA	GREJZA, Milan	1959/MALE
		GRUBER, Zoran	1969/MALE
		GUDELJ, Drago	1940/MALE
		HEGEDUSIC, Tomislav	1953/MALE
		HEGEDUSIC, Mario	1972/MALE
		HERCEG, Zeljko	1962/MALE
		HERMAN, Ivan	1969/MALE
		HERMAN, Stjepan	1955/MALE
		HLEVNJAK, Nedeljko	1964/MALE
		HOLJEVAC, Nikica	1955/MALE
		HORVAT, Ivica	1958/MALE
		HORVAT, Viktor	1949/MALE
		HUSNJAK, Nedjeljko	1969/MALE
		ILES, Zvonko	1941/MALE
		IMBRISIC, Ivica	1957/MALE
		IVAN, Zlatko	1955/MALE
		IVEZIC, Aleksander	1950/MALE
		JAJALO, Marko	1957/MALE
		JAKUBOVSKI, Martin	1971/MALE
		JALSOVEC, Ljubomir	1957/MALE
JAMBOR, Tomo	1966/MALE		
JANIC, Mihael	1939/MALE		
JANJIC, Borislav	1956/MALE		

	JANTOL, Boris	1959/MALE
	JARABEK, Zlatko	1956/MALE
	JEZIDZIC, Ivica	1957/MALE
	JOVAN, Zvonimir	1967/MALE
	JOVANOVIC, Branko	1955/MALE
	JOVANOVIC, Oliver	1972/MALE
	JULARIC, Goran	1971/MALE
	JURELA, Damir	1969/MALE
	JURELA, Zeljko	1956/MALE
	JURENDIC, Drago	1966/MALE
	JURISIC, Marko	1946/MALE
	JURISIC, Pavao	1966/MALE
	JURISIC, Zeljko	1963/MALE

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVCARA	KACIC, Igor	1975/MALE
		KAPUSTIC, Josip	1965/MALE
		KELAVA, Kresimir	1953/MALE
		KIRALJ, Damir	1964/MALE
		KIRALJ, Damir	1959/MALE
		KITIC, Goran	1966/MALE
		KNEZIC, Duro	1937/MALE

KOLAK, Tomislav	1962/MALE
KOLAK, Vladimir	1966/MALE
KOLOGRANIC, Dusko	1950/MALE
KOMORSKI, Ivan	1952/MALE
KOSTENAC, Bono	1942/MALE
KOSTOVIC, Borislav	1962/MALE
KOSIR, Bozidar	1957/MALE
KOVAC, Ivan	1953/MALE
KOVAC, Mladen	1958/MALE
KOVACEVIC, Zoran	1962/MALE
KOVACIC, Damir	1970/MALE
KOZUL, Josip	1968/MALE
KRAJINOVIC, Ivan	1966/MALE
KRAJINOVIC, Zlatko	1969/MALE
KRASIC, Ivan	1964/MALE
KREZO, Ivica	1963/MALE
KRISTICEVIC, Kazimir	1959/MALE
KRIZAN, Drago	1957/MALE
KRUNES, Branimir	1966/MALE
LENDEL, Tomislav	1957/MALE
LENDEL, Zlatko	1949/MALE
LEROTIC, Zvonimir	1960/MALE
LESIC, Tomislav	1950/MALE

	LET, Mihajlo	1956/MALE
	LILI, Dragutin	1951/MALE
	LJUBAS, Hrvoje	1971/MALE
	LONCAR, Tihomir	1955/MALE
	LOVRIC, Joko	1968/MALE
	LOVRIC, Jozo	1953/MALE
	LUCIC, Marko	1954/MALE
	LUKENDA, Branko	1961/MALE
	LUKIC, Mato	1963/MALE

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVCARA	MAGDIC, Mile	1953/MALE
		MAGOC, Predrag	1965/MALE
		MAJIC, Robert	1971/MALE
		MAJOR, Zeljko	1960/MALE
		MANDIC, Marko	1953/MALE
		MARICIC, Zdenko	1956/MALE
		MARIJANOVIC, Martin	1959/MALE
		MAZAR, Ivan	1934/MALE
		MEDESI, Andrija	1936/MALE
		MEDESI, Zoran	1940/MALE
		MERIC, Ohran	1956/MALE
		MIHOVIC, Tomislav	1952/MALE

MIKLETIC, Josip	1952/MALE
MIKULIC, Zdravko	1961/MALE
MIKULIC, Zvonko	1969/MALE
MILIC, Slavko	1955/MALE
MILJAK, Zvonimir	1950/MALE
MISIC, Ivan	1968/MALE
MLINARIC, Mile	1966/MALE
MOKOS, Andrija	1955/MALE
MOLNAR, Aleksandar	1965/MALE 1969/MALE
MUTVAR, Antun	1965/MALE
NAD, Darko	1935/MALE
NAD, Franjo	1958/MALE
NEJASMIC, Ivan	1966/MALE
NICOLLIER, Jean Michael	1970/MALE
OMEROVIC, Mersad	1950/MALE
ORESKI, Ivan	1963/MALE
PAPP, Tomislav	1959/MALE
PATARIC, Zeljko	1965/MALE
PAVLIC, Slobodan	1963/MALE
PAVLOVIC, Zlatko	1961/MALE
PERAK, Mato	1967/MALE
PERKO, Aleksandar	1965/MALE

	PERKOVIC, Damir	1963/MALE
	PERKOVIC, Josip	1949/MALE
	PETROVIC, Stjepan	

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

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

TIVANOVAC, Ivica

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVCARA	TOMASIC, Tihomir	1963/MALE
		TORDINAC, Zeljko	1961/MALE
		TOT, Tomislav	1967/MALE
		TRALJIC, Tihomir	1967/MALE
		TURK, Miroslav	1950/MALE
		TURK, Petar	1947/MALE
		TUSTONJIC, Dane	1959/MALE
		TUSKAN, Drazen	1966/MALE
		USAK, Branko	1958/MALE
		VAGENHOFER, Mirko	1937/MALE
		VARENICA, Zvonko	1957/MALE
		VEBER, Sinisa	1969/MALE
		VIDOS, Goran	1960/MALE
		VILENICA, Zarko	1969/MALE
		VIRGES, Antun	1953/MALE
		VLAHO, Mate	1959/MALE
VLAHO, Miroslav	1967/MALE		
VOLODER, Zlatan	1960/MALE		
VON BASINGGER, Harllan	1971/MALE		
VUJEVIC, Zlatko	1951/MALE		

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

**ANNEX IV
VICTIMS FROM VELEPROMET FACILITY, VUKOVAR**

PARAGRAPH 21

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX

November 1991	Velepromet	CRK, Antun	1942/MALE
	Facility, Vukovar	GOLAC, Veljko	1959/MALE
		MATOUSEK, Ivan	1958/MALE
		MIHALJEVIC, Nikola	1950/MALE
		SLUGANOVIC, Petar	1938/MALE
		VLADISAVLJEVIC, Deno	1971/MALE

**ANNEX V
VICTIMS FROM CELOPEK DOM KULTURE, ZVORNIK**

PARAGRAPH 22

DATE	LOCATION	VICTIMS	YEAR OF BIRTH
1 June - 26 June 1992	CELOPEK DOM KULTURE	HADZIC, Izet	1936
		ATLIC, Alija	1938
		SALIHOVIC, Husein	1950
		ZAHIROVIC, Salih	1946
		HALILOVIC, Hasan	1954
		DIHIC, Sead	1960
		PEZEROVIC, Zaim	1959
		BIKIC, Saban	1957
		ATLIC, Hasan	1952
		OKANOVIC, Omer	1936
		ALIHODIC, Benjamin	1969

		ALIHODIC, Ahmet	1965
		PEZEROVIC, Senaid	1957
		ATLIC, Abdulah	-

VICTIMS FROM KARAKAJ TECHNICAL SCHOOL, ZVORNIK

PARAGRAPH 22

DATE	LOCATION	VICTIMS	YEAR OF BIRTH
Between 1 and 5 June 1992	KARAKAJ TECHNICAL SCHOOL	SINANOVIC, Ramiz	1956
		JASAREVIC, Nurija	1961
		JASAREVIC, Avdo	1950

VICTIMS FROM GERO'S SLAUGHTER-HOUSE, ZVORNIK

PARAGRAPH 22

DATE	LOCATION	VICTIMS	YEAR OF BIRTH
Between 7 and 9 June 1992		HASANOVIC, Sejdo	1956
		HASANOVIC, Muradif	1957

ANNEX VI

ANNEX FOR VICTIMS FROM AGRICULTURAL CO-OPERATIVE IN CRKVINA, MUNICIPALITY OF BOSANSKI SAMAC

PARAGRAPH 23

DATE	LOCATION	VICTIMS	SEX

May 1992	Crkvina	AGATIC, Ivan	MALE
		ANTUNIC, Jozo	MALE
		BARTOLIC, Ivan	MALE
		BLAZANOVIC, Luka	MALE
		BRANDIC, Niko(1)	MALE
		GREGUREVIC, Luka	MALE
		HODZIC, Ruzmir ("Suma")	MALE
		HODZIC, Suad	MALE
		HURTIC, Sead ("Batan")	MALE
		LNU, Ermin	MALE
		LNU, Hilmo	MALE
		LNU, Ivica	MALE
		MANDIC, Franjo	MALE
		MATIC, Ilija	MALE
		MIJIC, Ivo	MALE
ORSOLIC, Josip	MALE		
TUZLAK, Ivo	MALE		
Unidentified Boy	MALE		