

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

**Case No. IT-00-39 & 40-PT**

**THE PROSECUTOR OF THE TRIBUNAL**

**AGAINST**

**MOMCILO KRAJISNIK**

**and**

**BILJANA PLAVSIC**

**AMENDED CONSOLIDATED 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:

**MOMCILO KRAJISNIK and BILJANA PLAVSIC**

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

**THE ACCUSED**

1. **Momcilo KRAJISNIK**, son of Sreten and Milka (née Spiric) was born on 20 January 1945 in Zabrdje, municipality of Novi Grad, Sarajevo, Bosnia and Herzegovina. He was a leading member of the Serbian Democratic Party of Bosnia and Herzegovina ("SDS") and he served on a number of SDS bodies and committees. On 12 July 1991, **Momcilo KRAJISNIK** was elected to the Main Board of the SDS. He was President of the Assembly of Serbian People in Bosnia and Herzegovina ("Bosnian Serb Assembly") from 24 October 1991 until at least November 1995. He was a member of the National Security Council of the Bosnian Serb Republic and from the beginning of June 1992 until 17 December 1992, he was a member of the expanded Presidency of the Bosnian Serb Republic.

2. **Biljana PLAVSIC**, daughter of Svetislav, was born on 7 July 1930 in Tuzla, Tuzla municipality,

Bosnia and Herzegovina. She was a leading member of the SDS from the period of its establishment in Bosnia and Herzegovina. From 18 November 1990 until April 1992, **Biljana PLAVSIC** was a member of the collective Presidency of Bosnia and Herzegovina. She served as President of the Council for Protection of the Constitutional Order of the Presidency of Bosnia and Herzegovina. From 28 February 1992 until 12 May 1992, she was an acting President of the Serbian Republic of Bosnia and Herzegovina. She was a member of the National Security Council of the Bosnian Serb Republic. On 12 May 1992, she became a member of the three member Presidency of the Bosnian Serb Republic and from the beginning of June 1992 until 17 December 1992, **Biljana PLAVSIC** served as a member of the expanded Presidency of the Bosnian Serb Republic.

## **INDIVIDUAL CRIMINAL RESPONSIBILITY**

### **Article 7(1) of the Statute of the Tribunal**

3. **Momcilo KRAJISNIK** and **Biljana PLAVSIC** are individually criminally responsible pursuant to Article 7(1) of the Statute of the Tribunal for the crimes referred to in Articles 3, 4, and 5 of the Statute of the Tribunal as alleged in this indictment, which they planned, instigated, ordered, committed or in whose planning, preparation or execution they otherwise aided and abetted. By using the word "committed" in this indictment, the Prosecutor does not mean that the accused physically committed any of the crimes charged personally. "Committed" in this indictment refers to participation in a joint criminal enterprise.

4. The joint criminal enterprise encompassed territories within the former Yugoslavia. Within the Republic of Bosnia and Herzegovina ("Bosnia and Herzegovina") the objective of the joint criminal enterprise was the permanent removal, by force or other means, of Bosnian Muslim, Bosnian Croat or other non-Serb inhabitants from large areas of Bosnia and Herzegovina through the commission of crimes which are punishable under Articles 3, 4, and 5 of the Statute of the Tribunal. **Momcilo KRAJISNIK** and **Biljana PLAVSIC** each participated in the joint criminal enterprise as co-perpetrators. Alternatively, the accused participated in the joint criminal enterprise as aiders or abettors.

5. The crimes enumerated in all the Counts of this indictment were within the object of the joint criminal enterprise, and **Momcilo KRAJISNIK** and **Biljana PLAVSIC** each held the state of mind necessary for the commission of each of these crimes. Alternatively, the crimes enumerated in all the Counts of this indictment were the natural and foreseeable consequences of the execution of the joint criminal enterprise and **Momcilo KRAJISNIK** and **Biljana PLAVSIC** were aware that these crimes were the possible consequence of the execution of the joint criminal enterprise.

6. The joint criminal enterprise was in existence at the time of the commission of the underlying criminal acts alleged in this indictment and at the time of the participatory acts of each of the accused in furtherance thereof.

7. Numerous individuals participated in this joint criminal enterprise. Each participant, by acts or omissions, contributed to achieving the objective of the enterprise. **Momcilo KRAJISNIK** and **Biljana PLAVSIC** worked in concert with other members of the joint criminal enterprise, including Radovan KARADZIC and Nikola KOLJEVIC. Other members of the joint criminal enterprise included: Slobodan MILOSEVIC, Zeljko RAZNATOVIC (aka "Arkan"), General Ratko MLADIC, General Momir TALIC, Radoslav BRDANIN, and other members of the Bosnian Serb leadership at the Republic, regional and municipal levels; members of the SDS leadership at the Republic,

regional and municipal levels; members of the Yugoslav People's Army ("JNA"), the Yugoslav Army ("VJ"), the army of the Serbian Republic of Bosnia and Herzegovina, later the army of the *Republika Srpska* ("VRS"), the Bosnian Serb Territorial Defence ("TO"), the Bosnian Serb police ("MUP"), and members of Serbian and Bosnian Serb paramilitary forces and volunteer units and military and political figures from the (Socialist) Federal Republic of Yugoslavia, the Republic of Serbia and the Republic of Montenegro.

8. **Momcilo KRAJISNIK** and **Biljana PLAVSIC**, acting individually, and through the associations, positions and memberships enumerated in paragraphs 12 and 13 below, and in concert with other members of the joint criminal enterprise, participated in the joint criminal enterprise in the following ways:

- a. formulating, initiating, promoting, participating in, and/or encouraging the development and implementation of SDS and Bosnian Serb governmental policies intended to advance the objective of the joint criminal enterprise;
- b. participating in the establishment, support or maintenance of SDS and Bosnian Serb government bodies at the Republic, regional, municipal, and local levels, including Crisis Staffs, War Presidencies, War Commissions ("Bosnian Serb Political and Governmental Organs") and the VRS, the TO, and the MUP ("Bosnian Serb Forces") through which they could implement the objective of the joint criminal enterprise;
- c. supporting, encouraging, facilitating or participating in the dissemination of information to Bosnian Serbs that they were in jeopardy of oppression at the hands of Bosnian Muslims and Bosnian Croats, that territories on which Bosnian Muslims and Bosnian Croats resided were Bosnian Serb land, or that was otherwise intended to engender in Bosnian Serbs fear and hatred of Bosnian Muslims and Bosnian Croats or to otherwise win support for and participation in achieving the objective of the joint criminal enterprise;
- d. directing, instigating, encouraging and authorizing the Bosnian Serb Political and Governmental Organs and Bosnian Serb Forces to carry out acts in order to further the objective of the joint criminal enterprise;
- e. exercising effective control over the Bosnian Serb Political and Governmental Organs and Bosnian Serb Forces which participated in or facilitated the commission of crimes identified in this indictment;
- f. encouraging, assisting or participating in the acquisition of arms or in the distribution of them to Bosnian Serbs to further the objective of the joint criminal enterprise;
- g. requesting the assistance of or facilitating or co-ordinating the participation of JNA/VJ forces and/or Serbian paramilitary units and Bosnian Serb paramilitary and volunteer units to further the objective of the joint criminal enterprise;
- h. directing or encouraging their subordinates in the Bosnian Serb Political and Governmental Organs and in the Bosnian Serb Forces to direct, assist or request assistance from JNA/VJ forces, Serbian paramilitary units and Bosnian Serb paramilitary and volunteer units in the commission of acts to further the objective of the joint criminal enterprise;
- i. directing, supporting or encouraging the incorporation into the Bosnian Serb Forces members of paramilitary forces and volunteer forces known to have participated or suspected of having participated in crimes;
- j. aiding or abetting or instigating the commission of further crimes by failing to investigate, to follow up on investigations, and to punish subordinates in the Bosnian Serb Forces for crimes committed against Bosnian Muslims, Bosnian Croats or other non-Serbs throughout the period described in this indictment; or
- k. engaging in, supporting or facilitating efforts directed at representatives of the international community, non-governmental organizations and the public denying or providing misleading information about crimes against Bosnian Muslims, Bosnian Croats or other non-Serbs of Bosnia and Herzegovina and about the role that Bosnian Serb Forces had played in

those crimes.

9. **Momcilo KRAJISNIK** and **Biljana PLAVSIC** participated in the joint criminal enterprise as stated above. On this basis, they each bear individual criminal responsibility for these crimes under Article 7(1) of the Statute of the Tribunal in addition to their responsibility under the same Article for having planned, instigated, ordered or otherwise aided and abetted in the planning, preparation, or execution of these crimes.

Article 7(3) of the Statute of the Tribunal

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

11. **Momcilo KRAJISNIK** and **Biljana PLAVSIC**, in their respective capacities as Acting President (Plavsic) or members of the Presidency (Plavsic) and the Expanded Presidency (Plavsic and Krajisnik) of the Serbian Republic of Bosnia and Herzegovina had *de jure* control and authority over the Bosnian Serb Forces and Bosnian Serb Political and Governmental Organs that participated in the crimes alleged in this indictment.

12. **Momcilo KRAJISNIK** held a prominent position in the Bosnian Serb leadership and was associated with Radovan KARADZIC, **Biljana PLAVSIC**, Nikola KOLJEVIC, other members of the Bosnian Serb leadership, and other members of the joint criminal enterprise. He was a member of the National Security Council, the Expanded Presidency of the Serbian Republic of Bosnia and Herzegovina, the Main Board of the SDS and the Bosnian Serb Assembly, of which he was also President. By virtue of those associations, positions and memberships, he had *de facto* control and authority over the Bosnian Serb Forces and Bosnian Serb Political and Governmental Organs and their agents, who participated in the crimes alleged in this indictment.

13. **Biljana PLAVSIC** held a prominent position in the Bosnian Serb leadership and was associated with Radovan KARADZIC, Nikola KOLJEVIC, **Momcilo KRAJISNIK**, other members of the Bosnian Serb leadership, and other members of the joint criminal enterprise. She was a member of the National Security Council, an Acting President, a member of the Presidency and the Expanded Presidency of the Serbian Republic of Bosnia and Herzegovina, and a prominent member of the SDS. By virtue of those associations, positions and memberships, she had *de facto* control and authority over members of the Bosnian Serb Forces and Bosnian Serb Political and Governmental Organs and their agents, who participated in the crimes alleged in this indictment.

14. **Momcilo KRAJISNIK** and **Biljana PLAVSIC** knew or had reason to know that all crimes alleged in this indictment were about to be committed or had been committed by their subordinates and they failed to take necessary and reasonable measures to prevent such acts or punish the perpetrators thereof. Each accused is therefore individually criminally responsible under Article 7(3) of the Statute of the Tribunal.

## THE CHARGES

### COUNTS 1 and 2 GENOCIDE, COMPLICITY IN GENOCIDE

15. Between 1 July 1991 and 30 December 1992, **Momcilo KRAJISNIK** and **Biljana PLAVSIC**, acting individually or in concert with each other and with Radovan KARADZIC, Nikola KOLJEVIC and other participants in the joint criminal enterprise, planned, instigated, ordered, committed or otherwise aided or abetted the planning, preparation or execution of the partial destruction of the Bosnian Muslim and Bosnian Croat national, ethnical, racial or religious groups, as such, in territories within Bosnia and Herzegovina.

16. As alleged in paragraphs 3 to 9, **Momcilo KRAJISNIK** and **Biljana PLAVSIC** participated in a joint criminal enterprise. The objective of the joint criminal enterprise was primarily achieved through a manifest pattern of persecutions as alleged in this indictment. In some Municipalities this campaign of persecutions included or escalated to include conduct committed with the intent to destroy in part the national, ethnical, racial or religious groups of Bosnian Muslims and Bosnian Croats as such. In these municipalities a significant section of the Bosnian Muslim and Bosnian Croat groups, namely their leaderships, as well as a substantial number of the members of the groups were targeted by Bosnian Serb Forces and Bosnian Serb Political and Governmental Organs and their agents for intended destruction. The most extreme manifestations of this form of partial destruction of the Bosnian Muslims and Bosnian Croats took place in Bosanski Novi, Brcko, Kljuc, Kotor Varos, Prijedor, and Sanski Most.

17. The destruction of these groups was effected by:

- a. the widespread killing of Bosnian Muslims and Bosnian Croats, including leading members of their communities, which took place during and after the attacks on towns and villages in the Municipalities and the killing of Bosnian Muslims and Bosnian Croats related to detention facilities. The killings that occurred during and after these attacks include those that are specified in **Schedule A**. The killings related to detention facilities include those that are specified in **Schedule B**.
- b. the causing of serious bodily or mental harm to Bosnian Muslims and Bosnian Croats, including leading members of their communities, during their confinement in detention facilities. The detention facilities include those that are specified in **Schedule C**. At these locations, detainees were subjected to cruel or inhuman treatment, including torture, physical and psychological abuse, sexual violence and beatings.
- c. the detention of Bosnian Muslims and Bosnian Croats, including leading members of their communities, in detention facilities under conditions of life calculated to bring about their physical destruction, namely through cruel and inhuman treatment, including torture, physical and psychological abuse and sexual violence, inhumane living conditions, forced labour and the failure to provide adequate accommodation, shelter, food, water, medical care or hygienic sanitation facilities. The detention facilities include those that are specified in **Schedule C**.

By these acts and omissions, **Momcilo KRAJISNIK** and **Biljana PLAVSIC** participated in:

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

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

### **COUNT 3 PERSECUTIONS**

18. Between 1 July 1991 and 30 December 1992, **Momcilo KRAJISNIK** and **Biljana PLAVSIC**, acting individually or in concert with each other and with Radovan KARADZIC, Nikola KOLJEVIC and other participants in the joint criminal enterprise, planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of persecutions of the Bosnian Muslim, Bosnian Croat or other non-Serb populations of the following municipalities: Banja Luka; Bijeljina; Bileca; Bosanska Krupa; Bosanski Novi; Bosanski Petrovac; Bratunac; Brcko; Cajnice; Celinac; Doboj; Donji Vakuf; Foca; Gacko; Hadzici; Ilidza; Ilijas; Kljuc; Kalinovik; Kotor Varos; Nevesinje; Novi Grad; Novo Sarajevo; Pale; Prijedor; Prnjavor; Rogatica; Rudo; Sanski Most; Sipovo; Sokolac; Teslic; Trnovo; Visegrad; Vlasenica; Vogosca and Zvornik ("Municipalities").

19. Bosnian Serb Forces and Bosnian Serb Political and Governmental Organs and their agents committed persecutions in the Municipalities upon Bosnian Muslim, Bosnian Croat or other non-Serb populations. The persecutions included:

- a. the imposition and maintenance of restrictive and discriminatory measures including:
  - i. the denial of freedom of movement;
  - ii. the denial of employment through the removal from positions of authority in local government institutions and the police and the general dismissal from employment;
  - iii. the invasion of privacy through arbitrary searches of homes;
  - iv. the denial of the right to judicial process; and
  - v. the denial of equal access to public services;
  
- b. killings during and after attacks on towns and villages in the Municipalities, including those listed in **Schedule A**;
- c. cruel or inhumane treatment during and after the attacks on towns and villages in the Municipalities including torture, physical and psychological abuse, sexual violence and forced existence under inhumane living conditions;
- d. forced transfer or deportation;
- e. unlawful detention in detention facilities, including those listed in **Schedule C**;
- f. killings related to detention facilities, including those listed in **Schedule B**;
- g. cruel or inhumane treatment in detention facilities including those listed in **Schedule C**. This treatment included torture, physical and psychological abuse and sexual violence;

h. the establishment and perpetuation of inhumane living conditions in detention facilities, including those listed in **Schedule C**. These conditions included the failure to provide adequate:

- i. accommodation or shelter;
- ii. food or water;
- iii. medical care; or
- iv. hygienic sanitation facilities

i) forced labour including digging graves and trenches and other forms of forced labour at front lines and the use of Bosnian Muslim, Bosnian Croat or other non-Serb populations as human shields;

j) the appropriation or plunder of property during and after attacks, in detention facilities and in the course of deportations or forcible transfers. The appropriation of property included the practice of forcing Bosnian Muslims, Bosnian Croats or other non-Serbs to sign documents turning over their property to Bosnian Serb governmental authorities in order to be allowed to leave the Municipalities; or

k) the intentional or wanton destruction of private property including homes and business premises and public property, including cultural monuments and sacred sites listed in **Schedule D**.

20. Beginning in March 1992, Bosnian Serb Forces and Bosnian Serb Political and Governmental Organs and their agents attacked and took control of towns and villages in the Municipalities. Before, during and after these attacks, they committed persecutory acts enumerated in paragraph 19 upon Bosnian Muslim, Bosnian Croat or other non-Serb populations.

21. Bosnian Serb Forces and Bosnian Serb Political and Governmental Organs and their agents established and controlled detention facilities in the Municipalities. After the attacks, Bosnian Muslim, Bosnian Croat or other non-Serb populations were detained in those facilities and were subjected to persecutory acts enumerated in paragraph 19.

22. From early April 1992, Bosnian Serb Forces and Bosnian Serb Political and Governmental Organs and their agents conducted persecutions by forcibly transferring and/or deporting Bosnian Muslim, Bosnian Croat or other non-Serb populations to areas inside and outside of Bosnia and Herzegovina as enumerated in paragraph 19.

23. Bosnian Serb Forces and Bosnian Serb Political and Governmental Organs that committed persecutions in the Municipalities undertook these acts with JNA/VJ forces and Serbian paramilitary units and Bosnian Serb paramilitary units and volunteer units.

By these acts and omissions, **Momcilo KRAJISNIK** and **Biljana PLAVSIC** participated in:

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

**COUNTS 4, 5 and 6**  
**EXTERMINATION AND KILLING**

24. Between 1 July 1991 and 30 December 1992, **Momcilo KRAJISNIK** and **Biljana PLAVSIC**, acting individually or in concert with each other and with Radovan KARADZIC, Nikola KOLJEVIC and other participants in the joint criminal enterprise, planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of the extermination and murder of the Bosnian Muslims, Bosnian Croats or other non-Serbs in the Municipalities. The extermination and murder was effected by:

1. killings during and after attacks on towns and villages including those listed in **Schedule A**; and
2. killings related to detention facilities including those specified in **Schedule B**.

25. The Prosecution alleges and incorporates by reference paragraphs 18 to 23.

By these acts and omissions, **Momcilo KRAJISNIK** and **Biljana PLAVSIC** participated in:

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

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

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

**COUNTS 7-8**  
**DEPORTATION, INHUMANE ACTS**

26. The Prosecution alleges and incorporates by reference paragraphs 18 to 23.

27. Between 1 July 1991 and 30 December 1992, **Momcilo KRAJISNIK** and **Biljana PLAVSIC**, acting individually or in concert with each other and with Radovan KARADZIC, Nikola KOLJEVIC and other participants in the joint criminal enterprise, planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of the forced transfer and deportation of Bosnian Muslims, Bosnian Croats or other non-Serbs from the Municipalities.

By these acts and omissions, **Momcilo KRAJISNIK** and **Biljana PLAVSIC** participated in:

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

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



## GENERAL ALLEGATIONS

28. All acts or omissions charged as Genocide or Complicity in Genocide, were committed with intent to destroy, in whole or in part, Bosnian Muslims and Bosnian Croats, national, ethnical, racial or religious groups, as such.

29. All acts and omissions charged as Crimes against Humanity were part of a widespread or systematic attack directed against the Bosnian Muslim, Bosnian Croat or other non-Serb civilian populations of Bosnia and Herzegovina.

30. At all times relevant to this indictment, a state of armed conflict existed in Bosnia and Herzegovina.

31. **Momcilo KRAJISNIK** and **Biljana PLAVSIC** were required to abide by the laws and customs governing the conduct of armed conflicts, including the Geneva Conventions of 1949 and the additional protocols thereto.

## ADDITIONAL FACTS

32. In 1990, multi-party elections were held in Bosnia and Herzegovina. At the Republic level, the SDA (*Stranka Demokratske Akcije* – Party of Democratic Action), the main party of the Bosnian Muslims, won 86 seats; the SDS (*Srpska Demokratska Stranka*), the main party of the Bosnian Serbs, won 72 seats and the HDZ (*Hrvatska Demokratska Zajednica* – Croatian Democratic Community), the main party of the Bosnian Croats, won 44 seats in the Assembly.
33. The SDS political platform included an emphasis on the unity of ethnic Serbs in a common state. By early 1991, the SDS began to organise certain areas of Bosnia and Herzegovina into Serbian regional structures.
34. On 25 June 1991, Slovenia and Croatia declared their independence. On 26 June 1991, the JNA was engaged in an armed conflict in Slovenia. In the summer of 1991, fighting broke out in Croatia.
35. In August 1991, the SDS leadership implemented a system of secret communication between local, regional and republic levels. Local boards of the SDS were required to report regularly to the SDS leadership.
36. As the war in Croatia continued, it appeared increasingly likely that Bosnia and Herzegovina would also declare its independence. The SDS implemented further steps to create a separate Serbian territory in Bosnia and Herzegovina, including the establishment of Serbian autonomous regions and districts.
37. In the autumn of 1991, the JNA began to withdraw its forces from Croatia and re-deploy

them in Bosnia and Herzegovina. Working in conjunction with certain elements in the JNA, the SDS covertly armed the Bosnian Serb civilian population.

38. A separate Bosnian Serb Assembly, dominated by the SDS, was founded on 24 October 1991 as the highest representative and legislative organ of Serbs in Bosnia and Herzegovina.
39. On 9 and 10 November 1991, the Bosnian Serbs conducted a plebiscite on whether Bosnia and Herzegovina should remain in a joint Yugoslav state. Bosnian Serbs were the overwhelming number of participants in the plebiscite and the overwhelming results were in favour of remaining in the reduced-Yugoslavia.
40. On 21 November 1991, the Bosnian Serb Assembly, proclaimed as part of the territory of the federal Yugoslav state all those municipalities, local communities and populated places in which over 50% of the people of Serbian nationality had voted, during the plebiscite, to remain in that state as well as those places where citizens of other nationalities had expressed themselves in favour of remaining in a joint Yugoslav state.
41. On 11 December 1991, the Bosnian Serb Assembly delivered a detailed request, signed by **Momcilo KRAJISNIK**, 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.
42. On 19 December 1991, the SDS issued instructions for the "Organisation and Activity of the Organs of the Serbian People in Bosnia and Herzegovina in Extraordinary Circumstances" which provided a plan for the SDS take-over of municipalities in Bosnia and Herzegovina, including the creation of Crisis Staffs.
43. On 9 January 1992, the Bosnian Serb Assembly adopted a declaration on the Proclamation of the Serbian Republic of Bosnia and Herzegovina. On 28 February 1992, the Constitution of the Serbian Republic of Bosnia and Herzegovina declared that the territory of that Republic included the territories of the Serbian Autonomous Regions and Districts and of other Serbian ethnic entities in Bosnia and Herzegovina, including the regions in which the Serbian people remained in the minority due to the genocide conducted against it in World War Two, and it was declared to be a part of the federal Yugoslav state.
44. 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 vote was overwhelmingly in favour of independence.
45. On 24 March 1992, during the 13<sup>th</sup> session of the Bosnian Serb Assembly, a conclusion was reached to prepare for the next session a programme for the take-over of power in the Republic of Serbian People of Bosnia and Herzegovina.
46. On 6 April 1992, the European Community formally recognised the independence of Bosnia and Herzegovina.
47. On 12 May 1992, at the 16<sup>th</sup> session of the Bosnian Serb Assembly, Radovan KARADZIC announced the six strategic objectives of the Serbian People in Bosnia and Herzegovina. These objectives included (a) Establish State borders separating the Serbian people from the

other two ethnic communities; (b) Set up a corridor between Semberija and Krajina; (c) Establish a corridor in the Drina river valley, that is, eliminate the Drina as a border separating Serbian States; (d) Establish a border on the Una and Neretva rivers; (e) Divide the city of Sarajevo into Serbian and Muslim parts and establish effective State authorities in both parts; (f) Ensure access to the sea for *Republika Srpska*. On the same day, these strategic objectives were promulgated in a Decision signed by **Momcilo KRAJISNIK** in his capacity as President of the Bosnian Serb Assembly.

48. Also on 12 May 1992, the Bosnian Serb Assembly voted to create the VRS, effectively transforming the JNA units remaining in Bosnia and Herzegovina and other armed forces working in concert in Bosnia and Herzegovina into commands of the new army. The Bosnian Serb Assembly appointed Ratko MLADIC as Commander of the VRS Main Staff. In this capacity Ratko MLADIC was directly subordinate to the Presidency.

---

Carla Del Ponte Prosecutor

Dated this 7<sup>th</sup> day of March 2002  
At The Hague,  
The Netherlands

<b>SCHEDULE A</b>			
<b>KILLINGS NOT RELATED TO DETENTION FACILITIES</b>			
No.	Municipality	Victims (killed)	Date
1	Bijeljina	1.1 The killing of at least 48 Bosnian Muslim and/or Bosnian Croat men, women and children in the town of Bijeljina.	1-2 April 1992
2	Bosanska Krupa	2.1 The killing of a number of non-Serb civilians.	21-22 Apr 1992
3	Bosanski Novi	3.1 A number of non-Serb civilians killed during the expulsion of non-Serbs from Blaga Japra and surrounding areas.	09-Jun-1992
		3.2 A number of non-Serb villagers of the hamlet of Alici were killed by Serb forces.	23-Jun-1992

4	Bratunac	4.1 Approximately 65 non-Serb civilians killed near the river in Glogova.	09-May-1992
5	Brcko	5.1 The killing of approximately 10 non-Serb men in front of the Hotel Posavina in Brcko.	04-May-1992
		5.2 The killing of a number of Muslim men in Mujkici village.	07-May-1992
		5.3 The execution of a number of civilians in the market place in Stari Grad area of Brcko.	07-May-1992
		5.4 A number of Muslim males killed at or around the police station.	08-May-1992
		5.5 The killing of an elderly Muslim woman during a home invasion by Serb police and paramilitaries.	21-Jun-1992
6	Foca	6.1 A number of non-Serb men executed by Serb soldiers in Djidjevo.	20-Apr-1992
		6.2 At least 5 Bosnian Muslims killed by Serb soldiers in a military warehouse in Filipovici.	26-Apr-1992
		6.3 The killing of a number of Bosnian Muslim and/or Bosnian Croat civilians from the villager of Jelec.	Between 1 May and 10 May 1992
		6.4 In Bavcici, the killing of 13 Muslim males.	19-May-1992
		6.5 Nine Muslim males killed in a tunnel, Miljevina.	01-Jun-1992
		6.6 14 Muslim men from Trnovaca executed by Serb soldiers in Brod.	22 June 1992
		6.7 Near Trosanj, a group of Muslim villagers hiding in the woods were killed while attempting to escape the area and after capture.	7 July 1992
7	Gacko	7.1 During an attack in the area of Kula and Meduljici villages dozens of non-Serb civilians, including elderly men, women, and children were killed.	17-Jun-1992

		7.2 A number of non-Serbs were killed near Mount Zelengora.	Between 18 and 23 June 1992
8	Ilijas	8.1 The execution on or about 5 June 1992 of eighteen Bosnian Muslim villagers from Ljesovo	4-5 June 1992
9	Kljuc	9.1 The execution on or about 30 May 1992 of Bosnian Muslim and/or Bosnian Croat villagers of Prohovo, including women and children in Prhovo and on the road to Peci	30 May - 1 June 1992
		9.2 The killing of a number of civilians, including women and children from the hamlet of Dzaferagici .	10-Jul-1992
		9.3 In Biljani, at least 30 elderly Muslim men were killed.	10-Jul-1992
10	Kotor Varos	10.1 In the town of Kotor Varos, approximately 13 non-Serbs were killed in and around the Medical Centre.	25-Jun-1992
		10.2 The killing on or about 13 August 1992 of seventeen Bosnian Muslim males of Dabovci village.	13-Aug-1992
		10.3 The killing of a number of non –Serb men in the mosque in Hanifici.	15-Aug-1992
11	Nevesinje	11.1 The killing of one Muslim male.	15-Jun-1992
		11.2 The killing of one Muslim male at the police station.	16-Jun-1992
		11.3 The killing of a number of non-Serb civilians from the village of Zulja.	01-Jun-1992
		11.4 Dozens of non-Serb civilians, including women and children, were killed." in Lipovaca and Dubrovaci	June - July 1992
		11.5. Near Kiser, approximately 17 Bosnian Muslim civilians were killed by Serb soldiers.	01-Jul-1992

12	Novi Grad	12.1 Muslim men fleeing from Ahatovici were ambushed and captured. Serb soldiers executed 15 of the captured men.	29-May-1992
		12.2 A number of Muslim men were killed at the bridge in Bojnik.	01-Jun-1992
13	Prijeedor	13.1 The killing of a number of non-Serbs in Kozarac and the surrounding areas between May and June 1992.	May-June 1992
		13.2 The killing of a number of non-Serbs in Mehmed Sahoric's house in Kamicani.	26-May-1992
		13.3 In Hambarine and Behlici, at least 3 Bosnian Muslims were killed.	11 June – 01 July 1992
		13.4 The killing of a number of non-Serbs in Hambarine.	23-May-1992
		13.5 The killing of a number of non-Serbs in the village of Jaskici.	14-Jun-1992
		13.6 In the Brdo region, including the villages of Carakovo and Biscani, numerous non-Serbs were killed.	May-July 1992
		13.7 The killing of a number of non-Serbs in the village of Brisevo.	24-Jul-1992
		13.8 The killing of a number of non-Serbs in the Ljubija/Kipe iron ore mine on or about 25 July 1992.	25-Jul-1992
		13.9 The killing of a number of non-Serbs at the Ljubja football stadium.	25-Jul-1992
		13.10 The killing of a number of non-Serbs in Tomasica.	03-Dec-1992
14	Sanski Most	14.1 The killing on or about 25 May 1992 of more than 30 Bosnian Muslim and/or Bosnian Croat women and children in the village of Hrustovo.	31-May-1992
		14.2 Killing of a number of non-Serb between Begici and Vrhpolje bridge.	31-May-1992

		14.3 In Kenjari, 19 Bosnian Muslim men were killed in Dujo Banovic's house.	27-Jun-1992
		14.4 In Budin, a number of non-Serbs were killed.	01-Aug-1992
15	Sokolac	15.1 Approximately 7 non-Serb villagers killed by Serbs in Tocionik village.	21-Jul-1992
		15.2 In the village of Meljine, 3 elderly non-Serb women were killed.	31-Jul-1992
		15.3 In the village of Zulj, two non-Serbs were killed.	01-Aug-1992
		15.4 In the village of Novoseoci, approximately 44 non-Serb men were killed.	22-Sep-1992
16	Visegrad	16.1 The execution throughout June 1992 of hundreds of Bosnian Muslim men, women and children of Visegrad at various bridges over the Drina.	May/June 1992
		16.2 The killing of more than 60 Bosnian Muslim and/or Bosnian Croat villagers from Kortnik village.	14-Jun-1992
		16.3 In Bikavac settlement, approximately 70 Bosnian Muslim and other non-Serb civilians were burnt to death in a house ignited by Serb paramilitaries led by Milan Lukic.	27-Jun-1992
17	Vlasenica	17.1 The killing on or about 2 May 1992 of approximately twelve Bosnian Muslim and/or Bosnian Croat males from the village of Drum.	02/05/1992  Jun 1992?
		17.2 The killing on or about 16 May 1992 of over 60 Bosnian Muslim and/or Bosnian Croat men, women and children of the village of Zaklopaca.	16-May-1992
18	Zvornik	18.1 The killing of fifteen Bosnian Muslim and/or Bosnian Croat males from the town of Zvornik.	09-Apr-1992

	18.2 A number of non-Serb civilians including women and children killed at a garage in Rasidov Han.	28/29 April 1992
	18.3 In Drinjaca, at least 55 Bosnian Muslim men were killed.	30-May-1992

<b>SCHEDULE B</b>			
<b>KILLINGS RELATED TO DETENTION FACILITIES</b>			
No.	Municipality	Victims (killed)	Date
1	Banja Luka	1.1 A number of non-Serb detainees transported from Sanski Most killed upon their arrival at Manjaca Camp.	Early June 1992
		1.2 The killing of a number of non-Serb men during their detention at Manjaca.	Between 6 June and 18 Sept 1992
		1.3 Several non-Serb prisoners suffocated in a truck while being transported from Sanski Most to Manjaca.	01-Jul-1992
		1.4 Killing of a number of non-Serb men from Omarska and/or Keraterm upon their arrival at Manjaca.	06-Aug-1992
2	Bosanska Krupa	2.1 A number non-Serb detainees killed during their detention at the Petar Kocic elementary school and while performing forced labour at the front line.	Between June and August 1992
3	Bratunac	3.1 At least 14 non-Serbs killed while detained at the Vuk Karadzic school.	10-16 May 1992
4	Brcko	4.1 Summary execution of Muslim detainees at Luka camp.	8-16 May 1992
5	Cajnice	5.1 At Mostina Hunting Lodge dozens of non-Serb detainees were killed.	19-May-1992



6	Doboj	6.1 A number of non-Serb prisoners detained at Percin's Disco were taken out and killed while being used as human shields during combat operations.	12-Jul-1992
7	Foca	7.1 Killing of at least 266 Bosnian Muslim detainees at KP Dom, including at least 36 during July.	June to December 1992
8	Gacko	8.1 Five Bosnian non-Serbs executed at Gacko SUP	03-Jul-1992
9	Kalinovik	9.1 The killing on or about 5 August 1992 of over twenty Bosnian Muslim male detainees from Kalinovik who were taken to Foca KP Dom, and from there later killed near Jelec-Foca municipality.	05-Aug-1992
10	Kljuc	10.1 The mass execution on or about 1 June 1992 of over one hundred Bosnian Muslim and/or Bosnian Croat males from the village of Velagici in Velagici School.	01-Jun-1992
11	Kotor Varos	11.1 The killing in November 1992 of approximately one hundred and ninety Bosnian Muslim and Bosnian Croat males of Grabovice village in Grabovice school.	01-Nov-1992
12	Nevesinje	12.1 A number of non-Serb civilians from villages of Sopilja, Borovcici, Lakat, Preskaja, Kljuna and surrounding areas were briefly detained at Zijemlja school and the heating plant were taken out and killed.	26-Jun-1992
13	Novi Grad	13.1 A number of non-Serb men were taken from Rajlovac camp and killed.	1 - 13 June 1992
		13.2 Near Srednje, 47 Bosnian Muslim men from Rajlovac camp were killed.	14-Jun-1992
14	Pale	14.1 In Pale, a number of non-Serb detainees were beaten and killed.	May-July 1992

15	Prijedor	15.1 In Omarska camp, hundreds of Bosnian Muslims and Bosnian Croats were killed, including in particular the execution on or about 20 July 1992 of over 150 Bosnian Muslim and/or Bosnian Croat males from the "Brdo" region of Prijedor.	May-August 1992
		15.2 The killing of a number of non-Serb men in Trnopolje camp.	28 May - October 1992
		15.3 The execution on or about 24-25 July 1992 of approximately one hundred and fifty Bosnian Muslim and/or Bosnian Croat males in Room 3 of Keraterm camp.	24-Jul-1992
		15.4 Near Hrastova Glavica, approximately 100 non-Serb men taken from Keraterm and Omarska camps were killed.	05-Aug-1992
		15.5 The execution on or about 21 August 1992 of approximately 150 Bosnian Muslim and/or Bosnian Croat males from Trnopolje camp and Prijedor town on Vlasic mountain in Skender Vakuf.	21-Aug-1992
16	Rogatica	16.1 The execution on or about 15 June 1992 of at least ten Bosnian Muslim males from Visegrad.	15-Jun-1992
		16.2 The killing of approximately 27 Muslim males taken from the detention facilities at Rasadnik.	15-Aug-1992
17	Sanski Most	17.1 In Sanski Most, a number of non-Serbs taken from Betonirka camp were killed near the Partisan cemetery.	22-Jun-1992
18	Teslic	18.1 In Teslic town, at least 5 non-Serb men were killed at the Territorial Defence building.	01-Jun-1992
		18.2 In Pribinic camp, at least 7 or 8 non-Serb detainees were killed.	Jun-Oct 1992
19	Vlasenica	19.1 A number of non-Serb detainees were taken out from the warehouse and killed at a pit.	01-Jun-1992

		19.2 A number of non-Serb detainees taken from the warehouse and executed on the main road to Nova Kasaba.	01-Jun-1992
		19.3 At Susica camp, a number of non-Serb male detainees were killed.	June and July 1992
20	Vogosca	20.1 A number of Muslim detainees were taken out for forced labour and service as human shields were killed.	Between 30 May and Dec 1992
		20.2 A number of Muslim detainees from the Svrake detention facility were killed while doing forced labour or as human shields at the front line.	May-December 1992
21	Zvornik	21.1 At Ekonomija farm, Karakaj, a number of non-Serb detainees were killed.	12-14 May 1992
		21.2 At Novi Izor building, at least 2 non-Serb male detainees were killed.	01-May-1992
		21.3 The killings in June 1992 of over thirty Bosnian Muslim and/or Bosnian Croat male prisoners at the Celopek Dom Kultur.	9-26 Jun 1992
		21.4 The mass killing on or about 1-5 June 1992 of approximately 160 Bosnian Muslim males at Karakaj Technical School.	1-5 Jun 1992
		21.5 The killing on or about 5-8 June 1992 of approximately 190 Bosnian Muslim and/or Bosnian Croat prisoners at Gero's slaughterhouse.	5-8 Jun 1992

<b>SCHEDULE C</b>		
<b>DETENTION FACILITIES</b>		
No.	Municipality	Name and/or location of detention facility
1	Banja Luka	1.1 Banja Luka Prison
		1.2 CSB building Banja Luka

		1.3 Mali Logor
		1.4 Manjaca
		1.5 Sports Hall
		1.6 Kozara Barracks
		1.7 Kastel
		1.8 Old Army Camp
		1.9 Camp at Borik Stadium
2	Bijeljina	2.1 Agricultural School, Bijeljina
		2.2 Bijeljina Barracks
		2.3 KP Dom Bijeljina
		2.4 SUP Bijeljina
		2.5 Batkovic
		2.6 Janja Field
		2.7 Novo Selo farm
		2.8 Patkovaca military warehouse
		2.9 Sugar factory
		2.10 Patkovaca farm cooperative
		2.11 Fortified castle
		2.12 4th of July public utilities
		2.13 Vanek's mill
		2.14 S. Haso school
		2.15 House of Velagic Osman in Janja
3	Bileca	3.1 Bileca barracks (AKA JNA Compound Mose Pijade)
		3.2 Bileca Police Station
		3.3 Bileca Prison
		3.4 Building behind the SUP in Bileca
		3.5 Dacki Dom (Students dorms)
4	Bosanska Krupa	4.1 Jasenica School
		4.2 Petar Kocic School
		4.3 Otoka Elementary School
		4.4 Suvaj Elementary School
		4.5 Gorinja Elementary School
		4.6 Arapusa Elementary School
5	Bosanski Novi	5.1 Japra Company

		5.2 (Mlavke) Stadium prison in Bosanski Novi
		5.3 Village of Blagaj
		5.4 Police station in Bosanska Kostajnica
		5.5 Vatrogasno building
		5.6 Una Hotel
		5.7 Fire Station
		5.8 Elementary School
		5.9 Suha Medja
		5.10 Ekic's private houses
		5.11 Police station in Bosanski Novi
6	Bosanski Petrovac	6.1 Kozila logging camp
		6.2 Police Station in Bosanski Petrovac.
		6.3 Kamenica (possibly in the neighbouring Opstina, Titov Drvar)
		6.4 Sports Centre
		6.5 Bus Station
		6.6 Hotel
		6.7 Jasikovac
		6.8. Vrtoce
		6.9 Workers' Barracks in Ostrelj
7	Bratunac	7.1 Bjelovac
		7.2 Bratunac Football Stadium
		7.3 Bratunac Police Station
		7.4 Vuk Karadzic School
		7.5 Stadium
		7.6 Warehouse
		7.7 Kravice cooperative house
		7.8 Konjevic polje Elementary School
		7.9 Basement of "Express Restaurant"
8	Brcko	8.1 Brcko Fire Station
		8.2 Brcko Hospital
		8.3 Laser Company Brcko
		8.4 Wooden Mosque - Kolobara
		8.5 Brcko Army Barracks
		8.6 Brezovo Polje

		8.7 Luka Camp
		8.8 Hotel Posavina
		8.9 Brcko SUP
		8.10 Orthodox Church
		8.11 Vestfalija Restaurant
		8.12 Football Stadium
		8.13 Elementary School Loncari
		8.14 DTV Partizan
		8.15 Pelagicevo farm cooperative shop
		8.16 Demolished villas in Potocari
9	Cajnice	9.1 Mostina Lodge (Fuel Container on same site in Mostina).
		9.2 Police Station Cajnice
		9.3 School
10	Celinac	10.1 Celinac Police Station
		10.2 Milos Dujic Primary School, Celinac
		10.3 Popovac
		10.4 SDK Bank, Celinac
11	Doboj	11.1 JNA/4 juli Barracks
		11.2 Percin's Disco
		11.3 Seslija Camp
		11.4 "Warehouse in Usora"
		11.5 Bare
		11.6 Central Prison in Doboj (Spreca)
		11.7 Doboj hangars
		11.8 "Usora"
		11.9 Doboj SUP
		11.10 Railway station
		11.11 SRC Ozren (centre for sport and recreation)
		11.12 High School Centre (SSC)
		11.13 Tyre Factory in Bare
		11.14 Stanari mine prison
		11.15 Stanari Elementary school
		11.16 Handball Stadium
		11.17 Bosanka

		11.18 Transmission line factory Rudanka
		11.19 Kotorko village
		11.20 Hangar PD Majevisa
		11.21 Putnikovo brdo military premises
		11.22 Seona
		11.23 Grapska Elementary School
		11.24 Miljkovac Military Barracks
		11.25 Piperi shop
		11.26 Sevarlije military barracks
		11.27 Podnovlje
		11.28 Vinska
		11.29 Majevac
		11.30 Ozren Kesten
12	Donji Vakuf	12.1 Durda's House, Donji Vakuf
		12.2 Donji Vakuf Police Station
		12.3 T.O. Warehouse, Donji Vakuf
		12.4 Vrbaspromet Warehouse, Donji Vakuf
		12.5 Daljan Barracks
		12.6 Oborci Elementary School
		12.7 Semesnica Hotel
		12.8 Kindergarten premises
		12.9 Garage in the house of Ivica Stanko
		12.10 Garage in the house of Loncar Goran
		12.11 Vrbas Hotel
		12.12 Oborci railway station building
13	Foca	13.1 Srednjoskolski centre High School
		13.2 Srednja Skola (probably same as above)
		13.3 Karaman's house
		13.4 Partizan Hall
		13.5 Restaurant opposite the KP Dom
		13.6 Workers huts at Buk Bijela
		13.7 Foca Hospital
		13.8 KP Dom, Foca
		13.9 Bukovica motel
		13.10 Miljevina Police Station

		13.11 TO Military warehouses, Livade Settlement
		13.12 Brioni
		13.13 Private house of Slobodan Matovic
		13.14 Velecevo reformatory
		13.15 Female camp in private house Miljevina
		13.16 Podedje purchasing station (otkupna stanica)
		13.17 Brod na Drini elementary school
		13.18 Cohodar mahala military warehouse
		13.19 Muslim house in Trnovaca
		13.20 Foca high school
		13.21 Private house of Munib Hodzic
		13.22 Presjeka Ustikolina
		13.23 Private apartment of Asima Dzanko in Donde Polje
		13.24 Private houses in the village of Didjevo
14	Gacko	14.1 Avtovac Post Office
		14.2 Gacko SUP
		14.3 Avtovac Barracks Gacko
		14.4 Fazlagica Kula
		14.5 Powerplant
		14.6 Samacki Hotel
15	Hadzici	15.1 Civil Defence HQ in Hadzici.
		15.2 Coco-Cola Factory in Hadzici
		15.3 Cultural and Recreational Centre in KSIRC (AKA Hadzici Sports Centre)
		15.4 Garage of the Municipality Building in Hadzici (AKA Hadzici Garage)
		15.5 Hadzici Sports Centre
		15.6 Vranica Dormitory huts in Hadzici.
16	Ilidza	16.1 Ilidza SJB Building
		16.2 Old building of the Health Centre Ilidza
		16.3 Camp Luzani Ilidza
		16.4 Building of CK Ilidza ( Red Cross)
		16.5 OS 27 Juli Ilidza
17	Ilijas	17.1 Bioca Primary School



		17.2 Cellars of the Prison in Ilijas
		17.3 Gornja Bioca School
		17.4 Ilijas SUP building
		17.5 Iskra Warehouse in Podlugovi, Podlugovi detention centre, Podlugovi School, Railway Station in Podlugovi.
		17.6 27 Juli Elementary School in Ilijas
		17.7 Police station Ilijas - Jail
18	Kalinovik	18.1 Primary School in Ulog
		18.2 Kalinovik Elementary School
		18.3 Kalinovik Police Station
		18.4 Powder magazine Jelasacko polje.
		18.5 Miladin Radojevic elementary school
		18.6 Ponor grain elevator (silos) / Gun powder warehouse
		18.7 Pavlovac farm
19	Kljuc	19.1 Kljuc Police Station
		19.2 Nikola Mazkic Elementary School
		19.3 Sitnica School
		19.4 Huts in Gornja Sanica
		19.5 Gornja Sanica Railway Station
		19.6 Sports hall
		19.7 Biljani elementary school
20	Kotor Varos	20.1 Alagic Café, Vrbanjci
		20.2 Jelsingrad Factory, Kotor Varos
		20.3 Kotor Varos Elementary School
		20.4 Kotor Varos Police Station
		20.5 Kotor Varos Prison (Stari-Zatvor jail)
		20.6 Maslovare School
		20.7 Sawmill (Pilana)
		20.8 High School Centre (SSC)
		20.9 Old court
		20.10 Siprage
		20.11 Kozara
		20.12 Medical centre (Dom zdravlja)
		20.13 Grabovica elementary school

		20.14 Vrbanjci petrol station
		20.15 Devdo's café in Vrbanjci
		20.16 Elementary school
		20.17 Popovac Celinac
21	Nevesinje	21.1 Basement of heating plant in Kilavci
		21.2 Camp at BORACKO lake
		21.3 Gornje Rakitno
		21.4 Tool factory
		21.5 Tool-shop
		21.6 Basement of a house in Borci
22	Novi Grad	22.1 Rajlovac Barracks (including barracks, Rajlovac Hangar, fuel cisterns)
23	Novo Sarajevo	23.1 Crisis Staff Centre Soping Grbavica
		23.2 Kula Prison
		23.3 Garages and basements of Grbavica N. Sarajevo
		23.4 Shop Digitron Buje N. Sarajevo
		23.5 Rooms of MZ (local community) Vrace N. Sarajevo
		23.6 Lukavica Barracks, Slavisa Vajner Cica Barracks, Lukavica
24	Pale	24.1 Pale Scout House
		24.2 Pale School Gym
		24.3 Pale SUP
		24.4 Former Pale Cinema
		24.5 Hotel Koran Pale
25	Prijedor	25.1 Army (Military Barracks) Barracks Prijedor
		25.2 Police station in Prijedor
		25.3 Command Post at Miska Glava
		25.4 Omarska
		25.5 Keraterm Camp
		25.6 Trnopolje
		25.7 Elementary School Kozarac
		25.8 Railway Station Ljubija
		25.9 Stari Majdan Ljubija
		25.10 Stadium Ljubija

25.11 Rubber factory PROTEKTIRNICA Brezicani
25.12 Mravinj village
25.13 Local Office Orlovac
25.14 Elementary School Donji Garevci
25.15 Elektrokozarac Kozarac
25.16 Sanducara Kozarac
25.17 Stadium Kozarac
25.18 Church Krkici
25.19 Hladnjaca
25.20 Vitlovska village
25.21 Hotel Mrakovica
25.22 Bosnamontaza
25.23 Cattle market
25.24 Bus station Zecovi
25.25 Railway station Kozarac or Trnopolje
25.26 Railway station Petrov Gaj
25.27 Cattle market Omarska
25.28 Sport Hall Mladost
25.29 Old saw mill Kozarac
25.30 Dom Kulture Kozarac (community centre)
25.31 Brezine
25.32 Tukovi
25.33 Kratelj
25.34 Karan
25.35 Dom Kulture Cela (community centre)
25.36 Elementary school Kevljani
25.37 Elementara
25.38 Two detention locations in Brezicani
25.39 Sport Centre
25.40 Mine Ljubija
25.41 Elementary school in Sivci near Trnopolje
25.42 Huts OSC Benkovac
25.43 Majdan

		25.44 Crna kuca (Black house)
		25.45 Ciglane (brickyards)
		25.46 Jaruge (ravines)
		25.47 Pozoriste (theatre)
		25.48 Topola
		25.49 Tomasica
		25.50 Hrnici Sarena Crkva (colorful church)
		25.51 Ceramics tile factory Urije
		25.52 TOMEX factory Ljubija
		25.53 Fire station Ljubija
		25.54 Velepromet Prijedor
		25.55 Kozaraputevi prijedor
		25.56 Stamparija Kozarac (Printshop)
		25.57 Prijedorcanka juice factory Brzicani
		25.58 Bus station Zeger Carakovo
26	Rogatica	26.1 High School in Rogatica
		26.2 Rogatica Farm
		26.3 Rogatica School
		26.4 Rogatica Square
		26.5 Building used for cattle exhibitions in Rasadnik, Prison in Rasadnik, Sladara malt house Rogatica, "Room at Rasadnik".
		26.6 Veljko Vlahovic School, Rogatica
		26.7 Rogatica SUP
		26.8 Stud farm Borike
		26.9 Mountain hostel Podgoj
		26.10 Crkveni dom (church premises)
27	Rudo	27.1 JNA Barracks
		27.2 Recreation centre
28	Sanski Most	28.1 Betonirka Prison Camp
		28.2 Hasan Kikic sports hall in Sanski Most.
		28.3 Krings Hall in Sanski Most.
		28.4 Military garage in Sanski Most
		28.5 Sanski Most Police Station
		28.6 Sports Hall called "Krkojevci" in Sanski Most

		28.7 Sanski Most Prison
		28.8 Lusci Palanka (SUP)
		28.9 Central prison Sana
		28.10 Elementary School "Narodni Front"
		28.11 Kamengrad
		28.12 "Gornja Mahala" elementary school
		28.13 House of Simo Miljus
		28.14 Keramika
		28.15 Lufani
		28.16 Stari Majdan
		28.17 Podvidaca
		28.18 Hotel boiler room
		28.19 Sekovci
		28.20 Trnova – house of Senad Supuk
		28.21 Kozica School
		28.22 Tomina school - boiler room
29	Sipovo	29.1 Sipovo SUP
30	Sokolac	30.1 Cavarine Elementary School
		30.2 Slavisa Vajner Cica Elementary School
		30.3 Podromanija cattle farm
		30.4 Post office Knezina
		30.5 Elementary school gymnasium
		30.6 Winter road maintenance point
		30.7 Plants of KTK Knezina
		30.8 SIPAD Romanija
		30.9 Private houses Cavarlija
		30.10 Slaughter House Sokolac
31	Teslic	31.1 TO Warehouse Teslic
		31.2 "hangar" in the TO
		31.3 Teslic Police Station.
		31.4 Detention Centre in Pribinic
		31.5 Mladost School
		31.6 SUP Teslic
		31.7 Teslic Prison
		31.8 Teslic T.O. Building

		31.9 Pribinic Post Office
		31.10 Stadium of Proleter football club
		31.11 Health resort Banja Vrucica
		31.12 Perco Villa
		31.13 Hangars
		31.14 Central prison
		31.15 Appartments Grabovica
		31.16 Kotorско Bare
		31.17 Barracks
		31.18 Grapska
32	Vlasenica	32.1 Vlasenica Police Station
		32.2 SUP in Vlasenica
		32.3 Vlasenica Prison
		32.4 Vlasenica Secondary School
		32.5 Stadium in Vlasenica
		32.6 Susica
		32.7 Playground Kasaba
		32.8 Sawmill MilicI
		32.9 Elementary School
		32.10 Cooperative Stables Piskavice
		32.11 High School Centre (SSC)
		32.12 Hotel Panorama
		32.13 High School Hall
		32.14 Military Sport Hall
		32.15 Dom Kulture Milici (Community centre)
		32.16 Camp Luka
		32.17 Chicken Farm Sosari
33	Vogosca	33.1 Planija Kuca in Svrake :Detention centre in Planjo's house
		33.2 Bunker (On road b/t Svrake and Vogoska)
		33.3 Semizovac (Barracks, "House in", Planja Kuca)
		33.4 Kisikana Company Building
		33.5 UPI Company Distribution centre
		33.6 Hospital Jagomir – Centar

		33.7 Nike's Garage
		33.8 Police station Vogosca
		33.9 Hotel Park
34	Zvornik	34.1 Novi Izvor (Cigлана) Factory, Karakaj
		34.2 Company building called Novi Izvor (HQ for above)
		34.3 Orahovac CS HQ
		34.4 Prison near Novi Izvor.
		34.5 Standard Factory, Karakaj
		34.6 Zvornik Prison
		34.7 Zvornik SUP
		34.8 Celopek. A building known as Dom Kulture.
		34.9 Ekonomija Factory, Karakaj, Ekonomija Farm, Karakaj (Part of above)
		34.10 KTS (Karakay Technical School) in Zvornik
		34.11 Zvornik Police station
		34.12 Cinema in Pilica
		34.13 Gero's Slaughter house (Gerina Klaonica)
		34.14 School KnezevicI
		34.15 Clay Factory Karakaj
		34.16 Stadium Divic
		34.17 Administration Building entrance
		34.18 Alhos Factory
		34.19 Standard Factory
		34.20 "Hladnjaca" enterprise (refrigeration plant)
		34.21 Youth Village
		34.22 Sport Hall
		34.23 Community Centre Drinjace (Dom Kulture)
		34.24 Orahovac Karakaj
		34.25 House of Pasa Salihovic at Liplje and Elementary School
		34.26 Motel Vidikovac

**SCHEDULE D****DESTRUCTION OF CULTURAL MONUMENTS AND SACRED SITES**

No.	Municipality	Name and/or location of mosque or church
1	Bijeljina	1.1 Mosque at Bijeljina town
2	Bosanska Krupa	2.1 Mosque in the town of Bosanska Krupa
		2.2 Catholic Church in the town of Bosanska Krupa
3	Bosanski Novi	3.1 Gradska Džamija in the town of Bosanski Novi
		3.2 Mosque in Urije
		3.3 Mosque in Prekosanje
		3.4 Catholic Church in Bosanska Kostanica
		3.5 Mosque in Bosanska Kostanica
		3.6 Mosque in Blagaj Japra
		3.7 Catholic Church in the town of Bosanski Novi
		3.8 Vidorijska mosque
		3.9 Blagaj Rijeka
		3.10 Stara Suhaca
		3.11 Suhaca mosque
4	Bosanski Petrovac	4.1 Mosque in Bjelaj
		4.2 Mosque #1 in the town of Bosanski Petrovac
		4.3 Mosque #2 in the town of Bosanski Petrovac
		4.4 Mosque #3 in the town of Bosanski Petrovac
		4.5 Mosque in Rasnovac
5	Bratunac	5.1 Mosque in Glogova
		5.2 Mosque in the town of Bratunac
6	Brcko	6.1 Mosque #1 in the town of Brcko
		6.2 Mosque #2 in the town of Brcko
		6.3 Mosque #3 in the town of Brcko



7	Cajnice	7.1 Mosque #1 in the town of Cajnice
		7.2 Mosque #2 in the town of Cajnice
		7.3 Mosque at Medjurjece
8	Celinac	8.1 Mosque #1 in the town of Celinac
		8.2 Mosque #2 in the town of Celinac
		8.3 Mesjid in Basici
9	Doboj	9.1 Mosque #1 in the town of Doboj
		9.2 Mosque #2 in the town of Doboj
		9.3 Mosque #3 in the town of Doboj
		9.4 Catholic Church in the town of Doboj
		9.5 Mosque in Gornja Grapska
10	Donji Vakuf	10.1 Dusica Dzamija mosque in the town of Donji Vakuf
		10.2 Basdzamija mosque in the town of Donji Vakuf
		10.3 Fadilova Dzamija mosque in the town of Donji Vakuf
		10.4 Mosque at Torlakovac
		10.5 Mosque at Korenici
11	Foca	11.1 Alazda mosque in the town of Foca
		11.2 Mosque in Jelec
		11.3 Mosque at Donji Polje
		11.4 Cehotina mosque
12	Hadzici	12.1 Mosque in Grivici, Donji Hadzici
		12.2 Mosque in Hadzici
13	Ilijas	13.1 Mosque in Stara Ilijas
		13.2 Mosque in Ilijas
		13.3 Mosque in Misoca
		13.4 Mekteb in Bioca
14	Kalinovik	14.1 Mosque at Ulog
		14.2 Mosque at Hotovlje
15	Kljuc	15.1 Mosque in Biljani
		15.2 Mosque in Velagici
		15.3 Mosque in Krasulje
		15.4 Mosque in Pudin Han
		15.5 Mosque in Ticevici

		15.6 Mosque in the town of Kljuc
		15.7 Mosque at Sanica
16	Kotor Varos	16.1 Mosque in Hanifici
		16.2 Mosque in the town of Kotor Varos
		16.3 Mosque in Vrbanjci
		16.4 Mosque at Hrvacani
		16.5 Mosque at Ravni
		16.6 Mosque at Vranic
		16.7 Donja Varos mosque
		16.8 Mosque at Vecici
		16.9 Nova mosque at Vecici
17	Nevesinje	17.1 Mosque #1 in the town of Nevesinje
		17.2 Mosque #2 in the town of Nevesinje
		17.3 Mosque #3 in the town of Nevesinje
		17.4 Mosque at Kljuna
		17.5 Mosque at Ahatovici
18	Prijedor	18.1 Catholic Church in Brisevo
		18.2 Mosque in Hambarine
		18.3 Mosque in Puharska
		18.4 Mutnik mosque in Kozarac
		18.5 Catholic Church in the town of Prijedor
		18.6 Mosque in Biscani
		18.7 Mekteb in Sivci
		18.8 Mosque at Donja Ljubija
		18.9 Mosque at Brdjani
		18.10 Mosque at Kamicani
		18.11 Mosque at Hambarine
19	Prnjavor	19.1 Mosque in the town of Prnjavor
		19.2 Mosque in Lisnja
		19.3 Mosque in Puraci
20	Rogatica	20.1 Arnaudija mosque in the town of Rogatica
		20.2 Mosque #2 in the town of Rogatica
		20.3 Mosque in Kramer Selo
		20.4 Mosque in Lubardici

		20.5 Mosque in Vragalovi
21	Rudo	21.1 Mosque at Rudo town
		21.2 Mosque at Omacina
		21.3 Mosque at Strmica
		21.4 Mosque at Strgacina
22	Sanski Most	22.1 Mosque in Donji Kamengrad
		22.2 Mosque in Kamengrad
		22.3 Mosque in Kukavice Hrustovo
		22.4 Mosque in Keranovici, Hrustovo
		22.5 Mosque in Stari Madjan
		22.6 Mosque in Pobrijeze
		22.7 Mosque in the town of Sanski Most
		22.8 Mosque in Lukavica
		22.9 Mosque at Sehovci
23	Sipovo	23.1 Mosque in Staro Sipovo
		23.2 Mosque in Besnejvo
		23.3 Mosque in Pljeva
24	Sokolac	24.1 Mosque in Krusevci
25	Teslic	25.1 Catholic Church in the town of Teslic
		25.2 Mosque in Stenjask
		25.3 Mosque in Barici
26	Visegrad	26.1 Mosque in the town of Visegrad
27	Vlasenica	27.1 Mosque at Vlasenica
28	Vogosca	28.1 Mosque in Semizovac
		28.2 Mosque at Kobilja Glava
29	Zvornik	29.1 Mosque in Divic
		29.2 Mosque at Hasici
		29.3 Mosque at Liplje
		29.4 Mosque at Samari