

**UNITED
NATIONS**

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

Case No. **IT-03-69-T**

Date: **22 April 2010**

IN TRIAL CHAMBER I

Before: **Judge Alphons Orie, Presiding**
Judge Michéle Picard
Judge Elizabeth Gwaunza

Registrar: **Mr. John Hocking**

THE PROSECUTOR

v.

**JOVICA STANIŠIĆ &
FRANKO SIMATOVIĆ**

Public

PROSECUTION SUBMISSION OF PUBLIC WITNESS SUMMARIES

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THE INTERNATIONAL CRIMINAL TRIBUNAL
FOR THE FORMER YUGOSLAVIA

Case No. IT-03-69-T

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**JOVICA STANIŠIĆ &
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PROSECUTION SUBMISSION OF PUBLIC WITNESS SUMMARIES

1. On 18 February 2010, the Prosecution was instructed by the Trial Chamber¹ to file public summaries of witnesses that had previously testified in order to better inform the public about their evidence which was in part tendered in written format pursuant to Rule 92*ter*.
2. The Chamber listed a number of witnesses for which such summaries should be filed. Among them was witness JF-006. However, this witness testified in closed session. For that reason and in line with the guidance of the Chamber,² no public summary for this witness is filed. The Prosecution notes that witness Savić testified *viva voce* and in open court. As all his testimony is therefore public, no additional public summary is filed.
3. The Prosecution herewith files public summaries – as far as the evidence is not of a sensitive nature - for the following witnesses: Jasna Denona, Milorad Kovačević, Edin Hadžović, JF-005, JF-007,

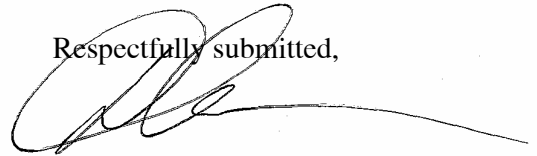
¹ Hearing 18 February 2010, T. 3671/3672.

² Hearing 18 February 2010, T. 3671:22/23

JF-008, JF-009, Charles Kirudja, Sulejman Tihic, Slobodan Lazarevic, Marko Miljanić and C-015.

Word Count: 173

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Dermot Groome', written over a horizontal line.

Dermot Groome
Senior Trial Attorney

Dated this 22nd day of April 2010
At The Hague, The Netherlands

**THE INTERNATIONAL CRIMINAL TRIBUNAL
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**ANNEX A
TO**

PROSECUTION SUBMISSION OF PUBLIC WITNESS SUMMARIES

A. Public summary of the evidence of witness Jasna Denona

1. The witness is a Croat female, age 15 at the time of the events. She lived in Bruška until the attack on her village on 21 December 1991.
2. The witness has testified that, on 21 December 1991, she was in the family kitchen with her mother (Marija Marinović), and neighbours Jeka Marinović, Sofija “Soka” Drača and Dragan Marinović. At around 7.45 p.m., someone knocked at the door. When she asked who it was, a male voice answered: “Marticevci”, Martić’s men. She asked again who was knocking. The male voice repeated: “Marticevci” and shortly later a burst of fire from an automatic weapon erupted. The witness noticed that several persons were outside the house. Together with the others she ran out of the house to hide somewhere outside. As she was trying to escape, she was shot at and wounded in her arm and hip.
3. When the attackers had left the area, she heard Jeka Marinović crying. Jeka had just found out that her husband Petar Marinović had been killed, along with Sveto Drača, Roko Marinović and Duško Marinović. Around midnight, Joso Marinović (the father of Dragan Marinović) arrived at the witness’ house, saying that he had found out that his wife, Ika Marinović, and his son Dragan had also been killed in front of their house. Shortly after that, Dujan Drača, who was the father of Sveto Drača, said that on his way to the witness’ house, he saw 4 bodies lying on the ground by the gate to the house of Krste Marinović. Later, the witness learned that the four people that had been killed were Krste Marinović, his wife Draša Marinović, and their neighbours Stana Marinović and Maša Marinović. Their house was a short distance from where the witness lived. Altogether, the Krajina Militia’s 21 December 1991 attack on Bruška killed 10 people within the witness’ small hamlet.
4. The witness was treated at the hospital in Knin and then came back to Bruška. She was traumatised by what had happened in her village on 21 December 1991 and could hardly sleep. On 18 January 1992, buses had been arranged for the non-Serbs of Bruška and the neighbouring villages to leave the area and go to Zadar. In 1995, after Operation “Storm”, the witness went back to see her family home. The house had been looted. It was full of ammunition including rifle ammunition, hand grenades, and artillery shells indicating that the Serb forces had used it. Down to the present day the witness suffers from the effects of her severe injuries. Her affected arm is permanently damaged and her disability is rated at 50 percent.

B. Public summary of the evidence of witness Edin Hadžović:

1. Before the elections in 1991, the witness saw KARADŽIĆ visiting Doboj very often to attend election campaigns. He described a huge military garrison in Doboj, in Miljkovac and the military warehouses in Potocani, Sevarlije and Bare. Milovan STANKOVIĆ became Commander of the Garrison during the war. Main activists in Doboj were STANKOVIĆ, Andrija BJELOŠEVIĆ (CSB) and Milan NINKOVIĆ (SDS). In 1992, weapons from Potocani and Sevarlije were transported to the barracks in Miljkovac, and thereafter the JNA provided weapons to the SDS who distributed it local Serbs. The witness described the setting up of checkpoints in Doboj in 1991 and an announcement that all non Serbs give up their weapons.
2. The Serbs started separating from the other ethnic groups and had a plan of annexing Doboj to their republic. The SDS did not accept the results of the elections in town that were won by the SDA. The Serbs did start to create their own bodies and obstructed the work of the regular bodies. Local Serb communities decided to separate from BiH and to be annexed to the RS. As early as October 1991, the SDS Doboj proclaimed a decision to proclaim Serb territories as part of the FRY. Serbs asked for those places with a majority Serb population to be separated and that minorities should move out which in practical terms meant expulsion.
3. Doboj was strategically important. On 3 May 1992, Doboj town was occupied by the Serbs. Heavy shelling started at 4pm. About 70% of non-Serbs fled from Carsija. On 6 May 1992, reserve soldiers started plundering the houses of Muslims who had left town. After the Serb take-over, Muslims and Croats were fired from their jobs, were arrested and put in camps and finally exchanged. A curfew was ordered while Muslim and Croat houses were looted.
4. On 8 May 1992, the witness was taken into custody by Serb soldiers with other male Muslims. Detainees in the cell at the central prison in Doboj, where the witness was detained, were all Muslims who held important positions in companies and were well known. The witness described crimes perpetrated by local Serbs on Muslims detained at the prison. The witness was released on 11 May, but re-arrested on 12 June 1992 by soldiers wearing camouflage uniforms and red berets and insignia with the four Serb "S"s. There were about one hundred of these soldiers in the streets and yards around the witness's house. The witness was taken with other neighbours -

mostly elderly men - to the military warehouse in Usora/ Doboj. On his arrest, the witness and the other men were beaten by the soldiers with baseball bats. All soldiers wore the same sort of uniform, along with red berets. There were over 200 prisoners held at the warehouse. The soldiers with the red berets did not stay there. Reservists from the army took over. On 19 June 1992, the witness was taken to Perčin's Disco at Vila, at the border of the town of Doboj, along with other detainees. Every day, prisoners there were beaten by soldiers.

5. Among the Serb soldiers there were Red Berets, ARKAN's men, White Eagles, men from Knin (Knindzas) and Predrags Wolves. The Red Berets arrived in Doboj in an organised way, they had been invited.

6. On 12 July 1992, 50 detainees were taken out by members of the Red Berets, a unit commanded by a soldier from Montenegro, who was called by the detainees CRNOGORAC. The detainees were used Serb soldiers as human shields on the battlefield. When the detainees were running towards the ABiH, the Serb forces shot at them and killed most of them. They were buried in a mass grave and later exhumed, when 27 bodies were found in mass graves in the village of Matuzici. The witness survived. He also attended the exhumation process and testified to the identification of the victims from the Perčin's disco.

7. The witness' family were exchanged to Croatia in 1992. The witness finally described how the ethnic distribution in Doboj changed throughout the war. About 80 – 90 % were Serbs after the war.

C. Public summary of the evidence of witness JF-005:

1. The witness was – as a young Serb and together with other young local Serb men - sent to a training camp of the Red Berets of the Serbian State Security (DB) in early 1992 on Mount Ozren near Doboj.
2. He testified to the Serb take-over of Doboj in early May 1992 from the perspective of the Red Berets and about the links between instructors and commanders, e.g. Rajo BOŽOVIĆ aka Rajo, Vuk and Riki, and the Accused Franko SIMATOVIĆ and Jovica STANIŠIĆ as well as other Serb leaders including Slobodan MILOŠEVIĆ. The Accused SIMATOVIĆ in 1992 visited the Red Berets camp in Doboj. BOŽOVIĆ, Vuk and Riki had been trained in 1991 in Golubic in the Croatian Krajina and then sent, as other DB instructors, to set up various new camps in Croatia and mostly BiH.

3. The witness gave evidence about crimes committed against non-Serbs in the Doboj area in 1992, including persecution, detention, torture and execution of civilians and deportation of Muslims and Croats. He explained the cooperation between the Red Berets and other Bosnian-Serb and Serb forces, including the military units under Major STANKOVIĆ. He also testified to the looting committed by Red Berets.
4. He further testified to the training of other (local) police and military Serb forces by the Red Berets, e.g. the Mice group of Milan NINKOVIĆ as well as about the links between the Red Berets and other Serb forces, including those of Captain Dragan, the Panthers of Ljubiša SAVIĆ aka Mauzer, the Wolves of Vučijak and others.
5. JF-005 gave evidence about the formation of the Red Berets, their structure and operations. After the Doboj operation, the witness was part of various Serb forces in Bosnia-Herzegovina (including the VRS military police under Đuro MARTIĆ, MLADIĆ's guards and later the VRS Doboj Brigade), while always remaining in close contact with BOŽOVIĆ of the Serbian DB. While serving in MLADIĆ's guard, he also observed frequent visits of high-ranking VJ including General PERIŠIĆ to the VRS command.
6. The witness further commented upon the so called Kula Camp video (Exhibit P00061) from May 1997, taken at the headquarters of the Unit for Special Operations (JSO) of the Serbian State Security. It was attended by the two Accused, President MILOŠEVIĆ and many other high-ranking officials from Serbia. STANIŠIĆ and MILOŠEVIĆ are seen greeting veterans of the JSO. Franko SIMATOVIĆ explains in a speech the history of THE UNIT back to 1991 and the first training camp in Golubić in the Croatian Krajina. The witness did identify BOŽOVIĆ, the commander and trainer from Doboj in 1992, on the video amongst other Unit veterans. The witness further confirmed that another video shown during his testimony was also taken at the Kula Camp, in November 2001. It shows the interior of a room at the camp with war booty exhibited and a Yugoslavia map on the wall with Wolves markings on it indicating training camps and other sites where the Red Berets had been involved during the war in Croatia and BiH.

D. Public summary of the evidence of witness JF-007:

1. In late March 1992, the witness saw on television the events in Bijeljina and she could hardly believe to what she saw. Her sister told her that it was true and that her other sister's two sons had been murdered outside the garrison in Bijeljina.
2. The first indications of the spreading of war to Zvornik occurred a few days before the attack on Zvornik when there was small-arms fire coming from Mali Zvornik and the arrival of tanks in the area.
3. On 8 April 1992, negotiations were held in Mali Zvornik with Arkan. After the meeting the witness was told about the situation and advised to leave. The witness decided to stay as she had Serb friends and had not done anything wrong. The attack on Zvornik commenced in the evening of 8 April 1992 by shelling from Mali Zvornik.
4. Following the attack, the witness and others from her apartment block, including her husband and sons, were sheltered in the basement of her apartment block. There were approximately 12 men, 16 women and 5 young children in the basement. No one in the cellar had any weapons, not even a pocket knife.
5. In the morning at about 10:00, the witness heard a strong detonation and the door to the cellar was exploded open. Immediately after the door was opened, about ten soldiers wearing camouflage uniforms, black woolly hats rolled down as masks and fingerless gloves burst into the cellar and threatened them with long rifles. The witness could tell by their accent that the soldiers were from Serbia.
6. The soldiers separated the men from the women and young children. The women and children were rushed out of the cellar. However, the witness saw the men from the cellar with their hands on their heads and with their backs facing the apartment building.
7. The witness was the last person out of the cellar and was ordered not to look around. One soldier forced the witness to move by putting a rifle to her back and cursed her.
8. After the witness had walked about 20 meters, she heard a simultaneous burst of gunfire from behind. The witness tried to look around, but the soldiers pushed her from the back with the rifle and prevented her from doing so. According to the

witness, the gunshots could only have come from the area outside the apartment building where the men from the cellar were lined up.

9. On the way to the SUP building, the witness saw two dead bodies lying outside houses. Loud Chetnik music was also played out of players as the witness walked down the street. The witness and other were made to go inside the library which is the opposite the SUP building where other soldiers were abusive to them and cursing Alija Izetbegović.

10. The soldiers in the library told the witness that they were Seselj's men and that they were the good guys and that all the killings had been done by Arkan's men. The witness knew that this was not true as Šešelj's men also fully participated in the killing of the men from the cellar.

11. Whilst the witness was in the library, a Serb woman named Vera was allowed by the soldiers to go back to the apartment building to change her clothes. When Vera came back, she told that she had seen the awful sight of the dead bodies of the men who had been taken out of the cellar. Other women who later arrived in the library also said that they had seen the dead bodies of the men.

12. Later in the day, Zeljko Ražnatović, aka Arkan, came to the library and told them that he would send buses to take the detainees away. The detainees were transported to Banja Koviljača. During the drive through Zvornik, the witness saw many dead bodies lying in the gardens in front of houses.

13. A week later, the witness and another Muslim woman tried to return to Zvornik. Upon arriving in Zvornik, the witness went to see Brano Grujić, the Serb President of the Municipality, Grujić informed them that there was no longer a place for them in Zvornik.

14. The witness briefly went back to her apartment and at the spot where she had last seen the men from the cellar saw her husband's hat and one of her son's sports shoes on the ground covered in blood. There was also blood which was peppered bullet holes on the walls. On the ground, the witness also saw a number of spent bullets. Of the men who were taken from the cellar and killed outside, one was witness's husband and two others were her sons.

E. Public Summary of the evidence of witness JF-008:

1. During July 1992, the witness was imprisoned in a place called Perčin's Disco, which was just outside Doboj, along with approximately 300 other Croat and Bosnian detainees. On 12 July, he witnessed members of a unit called the Red Berets chase approximately 50 of the detainees out of the disco.
2. He subsequently learned that these detainees were used as human shields between the Serb forces and members of the Army of Bosnia and Herzegovina. Approximately half of the detainees were killed in this way. One of the prisoners was shot beforehand by a member of the Red Berets as an example to the rest.
3. The witness provided evidence that the Red Berets were from Serbia and that they were feared by everyone, including the local police. The witness recognised the names of Radojica BOŽOVIĆ, whom he knew to be a Red Berets commander, and a few others on payments lists from Doboj. The witness also provided evidence about busses of Muslims and Croats leaving from Doboj in September of 1995.

F. Public summary of the evidence of witness JF-009:

1. In April 1992, armed Serb Soldiers came into the witness's village (Doboj municipality) and told them to hand over weapons. All of the collected weapons were loaded onto a JNA truck. The soldiers wore camouflage uniforms, black bandannas, and the 4 star insignia on their sleeve. On May 3 1992, Predo Kujundžić, the commander of a paramilitary group, came to the village and the witness and others were ordered to a youth house and one of the others was shot and injured.
2. The witness was detained in Perčin's Disco, along with other Muslim and Croat men, all of them civilians. He was severely beaten, persecuted, performed forced labour and witnessed killings. Soldiers and policemen were present and there were many Muslim men detained.
3. On 12 July 1992, a member of the Red Berets orderd 50 detainees out, including the witness. The detainees were forced to walk towards the front line. To pressure the detainees, one of them was shot by the Serb soldiers. The witness was ordered to throw the body of another killed detainee into the river.
4. The witness testfied that the Red Berets belonged to a special unit that was coming from abroad, judging by their accent. Most of them came from Serbia, only some were local Serbs. They had a base near the disco and performed exercises and training

on a daily basis. He did distinguish the Red Berets from the local paramilitary group of Predrag KUJUNDŽIĆ.

5. Many more detainees were killed by the Serbs when used as human shields. The witness identified several of them. He was taken back to Perčin's disco, later to the military warehouse at Usora and after a few days he was taken back to Perčin's Disco where conditions were the same as earlier.

6. A policeman arrived and called out some names from a list including the witness' name. The witness was then taken to the central prison (Spreca). He was kept there for 1 month. The witness saw a policeman beating one of the detainees in the same cell. He was not beaten himself.

7. After he was released from the prison, he performed forced labour. Soldiers assaulted his wife while he was detained. They left the municipality in July 1993. About 12 busses evacuated remaining non-Serb civilians from Doboj municipality at that time. The non-Serbs had no choice but to leave, while they even had to pay 50 German marks for the busses. He also testified to the destruction of Muslim property and mosques in the Doboj municipality.

G. Public Summary of the evidence of witness C-015:

1. The witness testified that on 1 August 1991, the JNA launched an offensive in the direction of Erdut and Dalj and Bijelo Brdo. Several days later, the Training Centre of the Territorial Defence in Erdut was cleaned by the local people, and weapons, ammunition and other military equipment was brought into the training centre from the JNA storage facility in Đerkaj. Shortly afterwards, Serbian volunteers from Croatia and Serbia started to arrive there. All companies went to the Training Centre to get weapons and other equipment.

2. The witness testified about the arrival of Radovan STOJIČIĆ aka Badža in the Vukovar region. He arrived in the Vukovar region together with the JNA. Before his arrival in Erdut, he spent about a week in Dalj, together with Pavle MILOVANOVIĆ, Commander of the Dalj TO, and then moved on to Erdut. STOJIČIĆ brought with him some 60 men who wore blue camouflage uniforms with no badges on their sleeves, and blue berets with the Serbian flag badge. They later traded their uniforms for dark green overalls, still keeping their blue berets. They were armed with RB automatic assault rifles, Zolja 8 rocket launchers, sniper rifles Zastava 7.9mm, and other regular equipment.

3. Whenever a TO unit in a village would go for an operation, it would not be led by the local TO Commander, but by one of the SUP Commanders from Badža's unit.
4. The witness testified about a meeting of all the Presidents of the Local Community Executive Councils, the Assembly, Territorial Defence, and the Militia in Erdut. Badža introduced himself at this meeting as the representative of the SUP from Belgrade, and said that he had been sent to the area as an expert to take over the TO of Eastern Slavonia, Baranja and Western Srem (SBWS).
5. When operations around Vukovar were concluded, Badža called for a similar meeting in Erdut on 25 or 26 December 1991. Stojičić informed those present that he was leaving the area as his task was completed. A certain ZAVIŠIĆ came along with Badža and was in charge to set up police stations.
6. The witness testified that in October 1991, the head of ARKAN's Military Police allegedly informed ARKAN that there were Croats living close to the Klisa airfield. The witness heard that ARKAN ordered Mile ULEMEK to bring them to Erdut. Those arrested were Jakov Barbarić, FNU³ Debić, FNU Curić, FNU Banček and FNU Kučan. One of the arrested, Jakov Barbarić, had a son in the JNA. The son asked for help the day after his father was arrested. A delegation of 5 people from Klisa went to see Milan MILANOVIĆ aka Mrgud to ask him what happened to the Croats from Klisa. Mrgud replied that they were inside ARKAN's Training Centre in Erdut for interrogation. The witness believed that these prisoners were murdered and thrown into one of the wells in Erdut.
7. ARKAN was factually not controlled by the local TO or JNA forces, but did cooperate with the JNA. MRGUD and ARKAN were very close. ARKAN's unit was stronger than the Army of the RSK.
8. Slobodan Boca was in charge of a unit called the SCOPRIONS, guarding the the oilfields in Đeletovci. His headquarter was in Mirkovci.
9. The witness testified about efforts to locate people missing in Eastern Croatia, including 5 Croatian soldiers from the "Carlton group", people removed from the Dalj Militia by ARKAN during the fall of 1991, eleven prisoners from Vukovar who disappeared after the fall of Vukovar, and a number of wealthy people from Dalj Planina. The commander of the JNA, a certain Boro IVANOVIĆ, had initially handed over the Croats to ARKAN.

³ First Name unknown.

10. Before the fall of Vukovar, Croats from Darda and Beli Manastir were arrested, put into mini vans, and driven via Serbia to Erdut and Dalj. These Croats were allegedly arrested by the Serb TO and were to be exchanged. When they got to Dalj, it was decided that they would stay there overnight. A policeman from Dalj Militia put them in a room at the "Poljoprivedna zadruga" building that was used as the Militia HQ, as the regular building of the Dalj Militia had been destroyed. During the course of the evening, ARKAN arrived in Dalj and when he learned there were Croatian prisoners locked up, he took them out and together with his men killed them. The bodies of those Croats killed in Dalj were allegedly thrown into the Danube River at the location called "Jama."

11. On another occasion after Vukovar surrendered, buses from Vukovar were transporting people from Vukovar through Dalj towards Serbia. Men from those buses were taken by Colonel STRIČEVIĆ for interrogation to the Dalj "Mjesna zajednica". From those buses, 11 people disappeared in total. The bodies were buried at the Catholic cemetery in Dalj. The witness testified that all family members of the owner of café "Kafana Sobonja" were killed and are reported as missing.

12. The witness described an incident in Tordinci where ARKAN and his men closed down the village, chased away soldiers of the Russian battalion stationed there, and exhumed a mass grave with allegedly 216 bodies. ARKAN transported the bodies out of the village to an unknown location.

13. The witness testified about the situation in Petrova Gora in Vukovar after Vukovar surrendered in November 1991. Many women and men were killed in the area, and many dead bodies were burned. The TO soldiers put used tyres on top of the bodies and burned them. The fire burned for 6 days and the TO sealed off the area during the operation. When it was finished the location was covered with soil.

14. After ARKAN left the Training Centre in Erdut and relocated to the restaurant "1001 Noć", militia found a Croatian soldier badly beaten and tied to a radiator inside of the Training Centre. It was a miracle this person survived, because ARKAN adopted a policy within his unit that all Croatian soldiers captured would be killed.

15. The witness testified that a large number of civilian and military vehicles in Erdut were brought and re-sprayed. Usually those vehicles which were used for ARKAN and his troops were sprayed black and stickers of ARKAN's tigers were put on doors. One of those vehicles was left in the Training Centre after ARKAN left.

16. The witness testified about the forming by Goran HADŽIĆ of the so-called “Sekuritet” (Srpska narodna bezbednost – Serb National Security) for Eastern Slavonia, Baranja and Western Srem. This was a security organisation that provided services for his government. All orders for this unit were coming directly from Goran HADŽIĆ. The witness heard from a number of people from Erdut Planina that in all incidents, in and around Erdut, such as arrests of non-Serb civilians, killings and lootings, members of the “Sekuritet” were involved. They closely collaborated with ARKAN’s men.

17. The witness testified about lists of names that were found in the desk of Stevo Bogić (best of man of HADŽIĆ) after he left the region. Those documents listed some 800 names of people that were detained by Serb forces and later on exchanged with Croatian authorities. Some names were crossed with a black marker and had handwritten notes, like “goldsmith, had money” etc. Approximately 100 such names were crossed out.

18. The witness also testified that the JNA was well informed about the crimes committed in the SAO SBWS, but that only one proceeding was initiated.

19. The witness testified that it was a known fact that Goran HADŽIĆ was receiving instructions from Belgrade. After he was appointed President of the RSK, HADŽIĆ was visiting MILOŠEVIĆ regularly and talked to him over the phone very often. After the visits to Belgrade, HADŽIĆ would come to the Regional Assembly (“Skipština”) and inform them what was to be done. The witness is specifically aware that Goran HADŽIĆ went at least twice to visit Slobodan MILOŠEVIĆ in Belgrade. Both these visits took place in the time period before the first election in the RSK in December 1993.

20. During the first visit to MILOŠEVIĆ, Milan MARTIĆ was also present. MILOŠEVIĆ heavily criticised Goran HADŽIĆ during this meeting for not being able to govern the country. When the meeting was over, MARTIĆ and HADŽIĆ were ordered to stay, while the rest of the group was dismissed from the office. Afterwards, HADŽIĆ issued a written order to summon the Skupština (Assembly). During the session, MARTIĆ and others requested new elections in the RSK. The Assembly had to vote on this proposal and it was accepted.

21. The second meeting took place shortly before the elections. HADŽIĆ said the meeting was arranged with MILOŠEVIĆ, but when HADŽIĆ arrived, he was met

only by a certain Senta, the head of MILOŠEVIĆ's security. Senta told him that MILOŠEVIĆ would not receive him and that he should come back only after the elections were over.

22. The witness testified about the Red Berets that were operating in the region and had one camp in Tikveš and the other in Pajzoš. These units were organised by the DB from Serbia. Boško VUKOMANOVIĆ and Radenko PANIĆ were members of the Red Berets and underwent training in Serbia. PANIĆ later went to the unit in Kula when ARKAN had left the RSK.

23. The witness testified about a video footage of a celebration at the training centre in Golubic / Krajina that was attended by leaders of the RSK, the SFRY, Ratko MLADIĆ on behalf of the JNA and ARKAN, as commander of the Serbian Volunteer Guards. The witness also commented on a video showing the celebration of the RSK Security Service Day on 5 July 1993 in Knin, attended by Milan MARTIĆ, Goran HADŽIĆ, Milan BABIĆ and Jovica STANIŠIĆ among others. Milan MARTIĆ at some time in 1992 or 1993 introduced STANIŠIĆ during a meeting with RSK police officers "as his one and only commander" and called him "iceman". From Knin, the group went to the training center in Golubić where also policemen for the SAO SBWS were trained. STANIŠIĆ went there as well. Some policemen from the SBWS were present. The witness talked to them and then returned to Slavonia.

24. The witness later saw STANIŠIĆ again at Rade KOSTIĆ's funeral, an employee of the State security department. That funeral was attended by Badža, Ilja KOJIĆ, General LONČAR, ARKAN and others. He also saw STANIŠIĆ when he came to Erdut with Badža in 1995, to meet with MRGUD.

25. The witness testified that in 1997, ARKAN's men participated in the re-burials in Eastern Slavonia. Graves from Bobota and from other areas were dug up and the bodies moved.

H. Public summary of the evidence of witness Milorad Kovačević:

1. The witness was a reserve police officer of the Serbian MUP at the time of the events described.
2. The witness testified about the Serbian MUP's arming of Serbs in Croatia and BiH. Together with active-duty policemen from the Police Brigade, the witness had

the task of transporting weapons from Serbia to a ferry on the Danube (on the Serbian side of the river) close to Borovo Selo. He testified that during one transport of arms four men in civilian clothes came up to him and introduced themselves as DB personnel. They said that from that moment on the witness was to obey their orders only. The witness described the transports and the participation of the Serbian DB.

3. The witness testified that in April 1991, Serbian volunteers from Serbia were sent to Borovo Selo. They were members of the Serbian Radical Party (SRS) and the Serbian National Renewal (SNO), and men from the DB of Serbia were also present there.

4. The witness recalls that during his training at Bubanj Potok, he noticed that, in addition to the JNA and his unit, training was also provided for ŠEŠELJ's volunteers from the SRS and the White Eagles. The training was organised by the SUP in co-operation with JNA officers. The JNA officers trained the witness' unit in special operations such as killing a person silently with a knife and laying mines. Once, while being trained at the Bubanj Potok barracks, he saw Franko SIMTAOVIĆ arriving to the barracks and going to the barracks command. At that time, there were units of the Serbian MUP, from the JNA and Serbian volunteers at the barracks.

5. The witness testified in detail about his unit being deployed to Croatia and what equipment was transferred at the end of July and in early August 1991. The witness' unit took up position at ARKAN's training centre in Erdut. The unit's commander was in constant contact with Radovan STOJIČIĆ, aka Badža, commander of the Serb TO for the SAO SBWS. The witness saw Franko SIMATOVIĆ coming once to attend a meeting in Erdut with Badža, ARKAN and others.

6. The witness testified that his unit was billeted in houses in Vera village, and that the command centre was headquartered in the house of a Croat who had fled the village. From that village his unit was sent towards Pačatin, Bobota, Bršadin, Marinci and Bogdanovci. When Bršadin and the Bršadin silo were liberated, they became a base for the JNA and all the units located in that area (the JNA, police and volunteers). The SAO SBWS formed Serb police units in all the above-mentioned settlements after they were liberated. The Serbian MUP supplied them with uniforms, weapons and other equipment, and they sewed SAO SBWS insignia onto the uniforms.

7. Radovan STOJIČIĆ commanded the witness' unit. The witness received orders for combat action from the JNA, but Radovan STOJIČIĆ had to be informed of these orders and approve them before they were allowed to act upon them.

8. His unit received fuel and other materiel for combat action from the JNA. The supplies for his unit – fuel, ammunition and money – arrived from Serbia. The witness received his pay (daily allowance), and his wife received his regular pay at his firm.

9. The witness testified to the interactions and decision-making of the leadership at various meetings including the participation at different points of Radovan STOJIČIĆ, ARKAN's logistics commander, and ARKAN and his commanders, among other leaders.

10. The witness testified that his unit was also active in the following villages in the Vukovar area: Vera, Erdut, Dalj, Pačetin, Borovo selo, Bobota, Bršadin, Marinci, Bogdanovci, Mirkovci, Lužac, Borovo naselje, Vukovar and Lovas.

11. The witness will testify about physical torture and beatings during questioning of prisoners, especially at the hands of those policemen who had come from Croatia. Prisoners were subjected to horrible torture. They were beaten with clubs and mistreated by members of the JNA and regular MUP units even before they arrived in the command building.

12. The witness testified about his recollections of the White Eagles, the Dušan Silni detachment/ members of the Serbian National Defence, ARKAN's men, Captain Dragan's Knindže /"Kninjas", and ŠEŠELJ's Chetnik units. The Chetniks were the biggest criminals and murderers; they maimed their victims, cutting off parts of their bodies. The witness recalled his unit found some mutilated bodies. They also raped women. ŠEŠELJ was in Vukovar, visiting his units. The witness saw him there a few times sometime in early November, around 10 November 1991.

13. The witness stated that many paramilitary units were formed in Serbia and 80-90% of their personnel came from Serbia. ARKAN's unit had much more modern weapons than the JNA at the time. The witness concluded that the State Security Service was behind ARKAN's unit. During one dispute with the witness' commander, ARKAN presented an ID card of the Serbian State Security and said that both the Serbian Ministry of Defence and the State Security were behind him. ARKAN

mentioned that his boss was in the Serbian State Security which at the time was headed by Jovica STANIŠIĆ.

14. The witness testified that whenever a settlement was liberated, paramilitary formations, especially Arkan's men, would go on a looting spree. Furniture, maize and wheat, appliances and vehicles – all was loaded onto trucks and taken to Serbia.

15. The witness further described the role of JNA General Andrija BIJORČEVIĆ and his relationship with ARKAN. He also commented upon a video footage that shows BIJORČEVIĆ praising ARKAN for his role in military operations.

16. The witness testified about the transportation of prisoners from Velepromet to the Sremska Mitrovica prison. At the gate they were stopped by two Serbian MUP patrols which escorted them to the Sremska Mitrovica KPD. These prisoners were beaten.

17. The witness saw once in 1991 Jovica STANIŠIĆ arriving in Erdut when the witness' superior had a meeting with Badža.

18. At the end of November of 1991, the witness returned to his firm and was involved in removing goods from Croatia and bringing them to Serbia.

19. The witness testified to the establishment of Serbian control in Vukovar in January and February of 1992 and about the presence of units from the Serbian MUP and that ARKAN's men controlled the flow of goods from Croatia to Serbia. ARKAN and the Serbian DB directly controlled crude oil at the Đeletovci oil field, and the oil was transported by Šidtrans/ Šid trucks and by trucks belonging to the Ruma-based Borovica transport. The oil was transported to the Pančevo oil refinery in Serbia. Everything that the SAO SBWS needed had to be brought in from Serbia. The JNA, which was still in the region, and the Serbian MUP units received their pay from the budget of the Republic of Serbia, which was filled through sales of this crude oil. The witness testified that as far as he knows, the sale of oil and goods, such as wine, taken out of Slavonia, was not properly registered.

20. The witness testified that during all these events around Vukovar, his commander and his deputy submitted all reports to Radovan STOJIČIĆ, and that he then sent them on to the Serbia MUP. The witness recalled that he went to Belgrade a few times to deliver official post and pick up the policemen's wages. The post was sealed, and he delivered it to the Serbian MUP on Kneza Miloša Street in Belgrade, where he also received the money for wages.

21. The witness testified that he received wages from the treasurer at the Serbian MUP. There was a list of people with the exact sums to be paid to each of them. He got this in a sealed bag. In addition to money for the policemen on the ground (between 800 and 1,000 policemen, including both active-duty policemen and reservists from the MUP of Serbia), the bag also contained money for the policemen from the SAO Krajina and, later, the RSK. When money for the JNA was brought, the JNA also provided an escort for security purposes.

22. The witness further testified about the SCORPIONS unit that was formed by the Serbian State Security and guarded the oil fields in Đeletovci.

23. The witness was mobilised in May or early June 1992, when more intensive war activity began in BiH. The VRS and the VJ were formed at that time. The witness was transferred to the zone of operations of the Užice Corps and received orders directly from the Užice Corps command centre, headed by Colonel Dragoljub OJDANIĆ. The unit that was sent there was a police unit from the Serbian MUP, and it included mostly active-duty policemen of Serbian origin from Croatia. The unit was also reinforced by policemen from the SUP of Užice, Čajetina, Prijepolje and Priboj.

24. The witness testified about the action in Višegrad in May 1992 and the participation of his unit along with ŠEŠELJ's units and the White Eagles. The paramilitary units were busy looting, setting Muslim houses on fire and killing people than conducting military operations.

25. After Višegrad, the witness' unit went up the Drina's left bank towards Srebrenica and Zvornik. The plan was to join the part of the VRS which was attacking Zvornik. There were parts of municipalities where cleansing was required. However, a few days later witness received an order from the VJ Main Staff and the Serbian MUP through Dragoljub OJDANIĆ saying that the VJ and Serbian MUP forces must withdraw to the territory of Serbia. After that they were active on the Serbian side, along the Drina's right bank.

26. The witness testified about the co-ordinated attack on Goražde in BiH.

27. In mid-March of 1994, he took part in escorting a convoy of seven busloads of people, including VJ officers sent to the VRS or SVK. Those who were held there had old JNA or TO uniforms without insignia. They received appropriate insignia upon their arrival in the RS or the RSK. As for the VJ officers who went to serve in the VRS or the SVK, they wore their VJ uniforms, but received VRS or SVK uniforms

upon their arrival in the VRS or the SVK. These buses were escorted by the Serbian MUP. When they arrived in the Morovička forest, they removed the MUP or VJ plates from the buses and replaced them with RS or RSK plates. Once in Belgrade when convoys were sent off, the witness saw Jovica STANIŠIĆ arriving. A colleague of the witness told him that the boss had arrived. At another occasion, he saw Franko SIMATOVIC at the barracks when men who hailed from the RSK or RS were to be transported back to these regions.

28. The witness testified that the Ministry of Defence, the VJ Main Staff and the Serbian DB found ways to avoid controls so they could transport ammunition, fuel and other supplies to the VRS. The witness recalled that transports were checked and the oil products were paid for by the Serbian DB and RS DB, and certain companies and people collaborating with the DB had the privilege to transport oil products.

29. The witness took part in dozens of convoys into BiH, and each convoy had between 30 and 40 trucks. The convoys were sent about twice a week. The witness testified about the various convoys he participated in as well as the logistics of each.

30. The witness testified to involvement of his Police Brigade in September 1995, after the situation in Western Bosnia deteriorated. The witness saw units led by ARKAN and ŠEŠELJ as well as other volunteers from Serbia. He described the various uniforms in detail and the arrival of MLADIĆ in September 1995 when the situation in the area had become serious. The "Drina Wolves", "Vučjak Wolves" and Mauzer's Panthers also arrived. He also commented upon video footage showing ARKAN and his men in Western Bosnia in 1995. ARKAN and his men came upon a request by the RS Government that was sent to the Serbian Ministry of Defence and the Serbian MUP. He also commented upon further video footage that showed a parade of ARKAN's men in Bijeljina in October 1995 and an award handed to ARKAN by Radovan KARADŽIĆ.

31. The witness testified that during a major incursion by Bosnian and Croatian forces, military activities were chaotic, and many atrocities were committed. The Drina Wolves, the Vučjak Wolves, Mauzer's Panthers and ARKAN's men did not take prisoners; nor did ŠEŠELJ's Chetniks.

32. During these military operations, the witness saw a Muslim soldier lay down his rifle and raise his hands and a member of the Vučjak Wolves come up to him and cut his throat. On another occasion, a group of about 20 POWs was rounded up in the

area between Sanski Most and Prijedor, close to the Sana river. Three members of ARKAN's unit in their uniforms approached this group and killed them. ŠEŠELJ's Chetniks who were standing by finished off those who had only been wounded.

33. The witness testified that POWs were subjected to interrogations and that they were often beaten during these interrogations. The witness recalled that six POWs were murdered while in the custody of his unit. He testified in detail about their murders and their place of origin.

34. The witness saw the two Accused again at the Kula Camp in May 1997 when the Unit for Special Operations (JSO) held a ceremony that was also attended by President MILOŠEVIĆ and Mihalj KERTEŠ.

I. Public summary of the evidence of witness Slobodan Lazarević:

1. The witness testified about his involvement with JNA security organs he referred to as "KOS". In 1990/1991 the witness was tasked to observe the activities of a prominent Muslim who organised the work of the SDA party in BiH.

2. The witness described how his lead "KOS" agent in summer 1991 brought him in contact with other "KOS" agents who at that time were actively involved in the events in the Krajina. The witness got in contact with Tošo PAJIĆ, the chief of police of Vojnić and MARTIĆ's police liaison in the region. The witness became aware that PAJIĆ had a close relationship with Jovica STANIŠIĆ. The witness also met Col. Pero Adjinović, another "KOS" officer who led a military unit tasked with "dirty jobs" in the Krajina.

3. The witness testified that these "KOS" officers in the summer of 1991 planned an attack on the Croatian Cetingrad and discussed whether all inhabitants should be killed or whether they should leave an escape route open into Velika Kladuša in BiH. The witness' lead agent preferred the latter approach because he wanted to observe the reactions of the Bosnian Muslims to the events and find out which of the local Muslims were Croatian sympathisers. This plan was eventually executed in October 1991 when the JNA attacked the undefended town and the Croat population fled to BiH.

4. After the adoption of the Vance plan the military forces were transformed into the RSK police forces. The witness described that this was a sham done by changing

uniforms and the colour of the vehicles while the structure and the personnel remained unchanged.

5. The witness described that the command structure of the Krajina police was parallel to other police organisations at the time. They had their state security within the police department, directly responsible to the state security of Serbia. The RSK police areas of responsibility were divided into sectors roughly corresponding to the UN sectors. Each sector reported to Minister of Interior of the RSK, Milan MARTIĆ.

6. The RSK police were paid from the same source as the army. The witness was present on a number of occasions when the “money-man” from Belgrade would arrive and distribute money to the members of police and military units.

7. Eventually the entire male population of the RSK was militarised. KOS and the Serbian DB maintained their presence in the RSK until August 1995. The witness testified to the structure of both organisations, their staff, their being financed by, and their reporting to, Belgrade. All staff originated from Serbia but were supplied with false identification documents, which read that they were from the RSK. The witness continued to report to his KOS lead agent.

8. The witness testified to the presence of MILOŠEVIĆ’s emissaries in the Krajina from the beginning of the conflict in 1990. Serbian DB staff and members from paramilitary units from Serbia orchestrated the uprising of the Croatian Serbs. Although the Belgrade media would report about the spontaneous actions of the local Serbs, incidents were created by Serbian DB members and then used to stir up the local population. The witness described Frenki SIMATOVIĆ’s and STANIŠIĆ’s presence and involvement in the Krajina.

9. The witness testified that the RSK government had an office in Belgrade provided by the Serbian DB. Whenever the RSK representatives attended a conference abroad they had to first go to Belgrade to get briefed on all agenda items that would be discussed. Usually a member of MILOŠEVIĆ’s cabinet would do the briefing, occasionally STANIŠIĆ.

10. The witness discussed extensively the role of the special forces from Serbia in the crimes committed in the RSK. He also testified in detail to the command of the Pauk operation and the involvement of Arkan’s forces and the special forces from Serbia under the control of Frenki Simatović in the Pauk command.

11. The witness testified to the general policy of Belgrade relative to international negotiations. Belgrade did not allow any settlement of issues between the RSK officials and the Croatian representatives. Belgrade was not interested in a peaceful solution to the conflict but wanted to maintain a high degree of tension in the area. The witness explained the reasoning behind this. Besides preventing any dialogue between the local Serbs and the Croats, the main approach in international negotiations was to delay matters. The Serbs were instructed to raise every conceivable technical problem to delay any agreement. Belgrade had to be briefed constantly and gave additional directions.

12. The witness testified to the policy of ethnic cleansing in the RSK, which resulted in the killing or removal of almost all Croats from the RSK by early 1992, except for some elderly. The witness testified that in the following years elderly Croats were arrested and used in prisoner exchanges. For the implementation of the policy, each corps in the SVK had a special unit for “dirty jobs” such as the unit of Ajdinović within the 21st Corps of the SVK. In the later years these units were charged with targeting Serb and Croat civilians, sometimes for murder. The military police units of the RSK controlled by Serbian DB Col. Karan conducted similar activities. Such deeds were then blamed on the Croats in order to create a climate of fear and hatred. The witness testified that the Croats did not penetrate the RSK and committed no so-called “terrorist acts”. However, such incidents were created to justify the necessity of a separate Serbian state to protect the Serbs.

13. The witness testified that he attended a military parade in Slunj on 28 June 1995, which was attended by Milan MARTIĆ, Captain Dragan and different “Red Beret” officials. The purpose of the parade was to intimidate the Croat and Bosnian forces.

14. The Serb population aware of the persecution campaign against the Croats feared retaliation. The Belgrade media, which spread false reports of killings of Serb civilians, fostered this fear. The Belgrade regime wanted the Serbs to leave the Krajina and to get resettled in Kosovo and Serb-held areas in BiH because the increase of a Serbian population in these areas helped strengthen their claims to retain control.

J. Public summary of the evidence of witness Charles Kirudja:

1. This witness was the Chief Civil Affairs Officer for the United Nations, located in Croatia in 1992. His position put him in constant contact with the situation in

Bosanski Novi. This witness has given testimony about the senior Bosnian Serb leadership in Bosanski Novi, as well as their knowledge of the humanitarian crisis faced by the Bosniak civilians from Bosanski Novi. Furthermore, based on extensive discussions with members of the Serb leadership in the Republika Srpska, this witness has testified about the plan for a “Greater Serbia” that he believes was inspired from, and co-ordinated by, the authorities in Belgrade.

2. This witness, as part of his duties as a Civil Affairs Officer, had repeated interactions with members of the SDS party in Bosanski Novi. In particular, in May and June of 1992, this witness participated in extensive discussions with Radomir PASIĆ, the SDS Mayor of Bosanski Novi (and head of the Bosanski Novi “Crisis Staff”), about the plight of local Bosniak civilians. This witness discussed with PASIĆ the need for Bosniak civilians to leave their homes, when PASIĆ had represented to this witness that conditions in Bosanski Novi were peaceful and orderly. PASIĆ admitted that armed Serb paramilitary forces were in fact harassing Bosniak civilians, and pressuring them to leave Bosanski Novi. This witness came to the conclusion, based upon his discussions with PASIĆ, that the Bosnian Serb authorities were planning a mass expulsion of the non-Serb population from Bosanski Novi. This witness authenticates numerous documents, including a letter written to PASIĆ in June 1992, advising him of the illegality under international humanitarian law, of the forced mass transfer of a population.

3. This witness was informed by UNPROFOR sources of mass gatherings of displaced Bosniak civilians by Bosnian Serb armed forces. This witness also confirmed that UN personnel observed the internment of Bosniak civilians at the Bosanski Novi football stadium. This witness prepared a report titled “Humanitarian Disaster in the Making in Bihac and Along the Bosnian Border,” which includes the witness’s conclusion that Bosnian Serb authorities were spreading misinformation about atrocities committed by Bosniaks in the vicinity of, inter alia, Bosanski Novi.

4. This witness has also confirmed the authenticity of a report he submitted to his superiors that concluded that Bosnian Serb authorities in BiH were trying to establish a territory that was free of Bosniaks. The witness discussed the forceful disarming of non-Serbs.

5. The witness got involved when the Bosnian Serbs took several UN soldiers hostage in the summer of 1995 in retaliation for and as a deterrent to NATO air strikes

against the VRS. MILOŠEVIĆ sent the Accused STANIŠIĆ, one of his closest confidants, to negotiate the release. STANIŠIĆ, who had complete authority with regard to this matter, dealt with MILOŠEVIĆ and KARADŽIĆ directly, met with MLADIĆ, and finally arranged the release of the hostages. In addition the witness also testified that the Defendant STANIŠIĆ had a preference for the hostages being released into the custody of his own forces who were present at the time in BiH.

K. Public summary of the evidence of witness Sulejman Tihic:

1. Sulejman Tihic is a Bosnian Muslim who was born and raised in Bosanski Šamac. Before the war he was a lawyer and was the President of the SDA in Bosanski Šamac. He was also a member of regional and national SDA committees. He testified regarding the political situation in the municipality before the war and how all the political parties were organised and interacted. He described many meetings he attended both with local officials and JNA officials concerning the rising tensions in the area. Tihic knew local perpetrators and discussed his relationships with them and general knowledge of their backgrounds and activities leading up to the war. He discussed what the SDA was doing in response to the rising tensions and what preparations they made for possible conflicts.

2. The witness described the attack on Bosanski Šamac. Because of his position as President of the SDA, many people expressed concern for his safety and he sought assistance from Borislav Pisarević, the defence attorney for Simo ZARIĆ. Tihic explained that while at Pisarević's home he had conversations with Blagoje SIMIĆ and Simo ZARIĆ and both of them recommended he surrender. Stevan TODOROVIĆ and others eventually came to arrest him and took him to the police station where he was detained for several days.

3. Tihic described being beaten repeatedly and humiliated while he was at the police station. He was interrogated repeatedly about weapons the SDA supposedly had collected and plans that the SDA had for war. On many occasions when he was beaten in the police station TODOROVIĆ either took part or ordered others to do the beatings. Tihic was eventually moved to the TO building where he was again subjected to beatings, mistreatment and interrogations. Tihic testified that after his detention and mistreatment in Bosanski Šamac he was transferred to Breko, and from there to Bjeljina, then Batajnica and later to Sremska Mitrovica. According to the

assessment of the witness during his detention at four different facilities the mistreatment always became most cruel, arbitrary and life-threatening whenever the members of the several paramilitary or Special Forces were present and involved.

4. The witness testified to his knowledge of the crimes committed in Bosanski Šamac and the role of the Special Forces from Serbia, whom he said played a leading role in their commission. Tihić gave evidence in relation to certain leading members of the special forces from Serbia and their involvement in the commission of crimes in Bosanski Šamac.

5. The witness told the Trial Chamber that he was compelled to give media interviews in detention at five different occasions. Finally he explained the circumstances under which he was released and his physical condition at the time.

L. Public summary of the evidence of witness Marko Miljanić:

1. Marko Miljanić was a police officer and former JNA Marine Infantry Officer who lived in Zadar in 1991. The witness testified that he resigned from the JNA in May 1991 because he did not want to fight against his own people. He joined the Croatian Police (MUP) and worked as a demining expert in Zadar. In September 1991 the Chief of the MUP Zadar and the Chief of the Zadar Crisis Committee (ZCC) sent him to organise the civilian defence in Škabrnja. He became responsible for the area of Škabrnja, Nadin, Zemunik Gornji, Prkos, Zemunik Donji, Galovac, Gorica and Glavica.

2. The village Škabrnja was inhabited only by Croats. The villagers did not have heavy weapons. There was neither any fire exchange between the Croats and the Serb forces nor any provocation by the Croat side. Before the 18 November 1991 attack, the Serbs passed through Škabrnja on their way to Zadar. The Croats in Škabrnja never fired at them or obstructed their movements.

3. On 25 September 1991 Škabrnja was shelled for the first time. The JNA used inflammatory bombs in order to set fire to the forest, therefore depriving the Croats of a place to hide. When people tried to extinguish the fire, the JNA started shooting at them. On 1 October 1991, Marko Miljanić received an order from the ZCC to evacuate the civilian population from Škabrnja. However, 245 people stayed in the village. On 2 October 1991, the JNA attacked Nadin and Zemunik Gornji, using

infantry and tanks. When people ran away from Nadin through Škabrnja the Air Force attacked Škabrnja.

4. In October 1991, the village guard captured two JNA officers, Dean BRENER (Intelligence Officer for the 9th Knin Corps) and Capt. JOVANOVIĆ (a Serb from Macedonia - the Commander of the Infantry unit based in Veljane.) Marko Miljanić interviewed the intelligence officer and found out that Ratko MLADIĆ was the commander of the 9th Knin Corps and had his headquarters both in Benkovac and Knin. The Serb officer warned Mr. Miljanić that MLADIĆ was a very nasty person and that his plan was to take over the whole Zadar region. The Serb officer further warned the witness that his men stood no chance against MLADIĆ's troops.

5. On 5 November 1991, all the Škabrnja inhabitants returned to the village because a cease-fire had been signed in The Hague. People started to live their normal life. Marko Miljanić testified that on 18 November 1991, a JNA attack on the village started at about 7.30 a.m. Mr. Miljanić warned civilians that they should hide in their basements. He saw that the village was attacked by at least 1000 soldiers. There were 28 tanks coming from different directions followed by JNA trucks full of infantry soldiers. It was clear that the attack was not organised on a local scale but that it was a broader JNA military operation, the so-called "Strategic Action."

6. Marko Miljanić testified to the circumstances surrounding the killing of civilians on 18 November 1991 by the Serb forces. He testified to the deaths of over 42 civilians and addressed the individual killings of Ana Brkić and Ms. Žilić, Joso Miljanić, Krsto Šegarić, Stana Viković and Luca Šegarić and 90 year old Grgica Šegarić. Šime Šegarić came to the witness' office and told him that the JNA was killing everybody in the village. On his way back, Šegarić himself was hit by a shell and killed. There were around 60 civilians hidden in the basement of the house where the witness had his HQ located. He did not tell them what was happening because he did not want to create a panic among them. At around 19:00 hours, he sent them towards the hamlet of Prkos, which was 3-4 km away from Škabrnja.

7. At about 11:30 a.m., Marko Miljanić heard a huge explosion and realised that a JNA truck with ammunition had exploded. About 5 or 10 minutes after this event he intercepted a conversation between Lt. Colonel Čečović who was the commander of the Motorised Brigade in Benkovac, and Ratko MLADIĆ on the JNA radio network. Čečović informed MLADIĆ about the loss of the ammunition supplies and that he

had to withdraw. MLADIĆ answered to Čečović that if he withdrew, he would shoot him. He promised him he would get everything he needed to succeed in the attack of Škabrnja: both soldiers and ammunitions. The witness knew MLADIĆ personally and therefore recognised his voice. Besides, MLADIĆ and Čečović were addressing themselves by their family names, without using coded language. One of the villagers also recognized the voice of Goran OPAČIĆ aka Klempo during this intercepted conversation. OPAČIĆ was a former member of the Zadar MUP and commander of the Intervention Unit of the MUP.

8. Marko Miljanić testified that after the conversation between MLADIĆ and Čečović he observed several helicopters landing in the surroundings. Mr. Miljanić saw young soldiers getting off, dressed in dark uniforms. The witness testified that they were Special Forces. The attack started again at about 12.30 and Škabrnja was divided in two parts. Serb forces dragged civilians out of the basements, killed some of them on the spot and used others as human shields, some of them the witness recognised with his binoculars. Between 16.30 and 17.00, there was another air attack and the witness lost his means of communication with Zadar. During the night all the civilians from the part of the village not yet occupied fled and managed to get to Zadar. The witness left the next morning.