

THE INTERNATIONAL CRIMINAL TRIBUNAL
FOR THE FORMER YUGOSLAVIA

CASE No. IT-95-5/18-T

IN TRIAL CHAMBER No. 3

Before: Judge O-Gon Kwon, Presiding
Judge Howard Morrison
Judge Melville Baird
Judge Flavia Lattanzi, Reserve Judge

Registrar: Mr. John Hocking

Date: 8 March 2016

THE PROSECUTOR

v.

RADOVAN KARADZIC

Public

107th MOTION FOR FINDING OF DISCLOSURE VIOLATION
AND FOR REMEDIAL MEASURES

The Office of the Prosecutor:

Mr. Alan Tieger
Ms. Hildegard Uertz-Retzlaff

The Accused:

Radovan Karadzic

1. Dr. Radovan Karadzic respectfully moves for a finding that the prosecution has once again violated its disclosure obligations pursuant to Rule 68 by failing to timely disclose exculpatory material. Dr. Karadzic also moves for remedial measures.

2. On 15, 22-25 February, and continuing on 1, 3, and 4 March 2016, the prosecution disclosed to Dr. Karadzic, approximately 1500 exculpatory documents, totaling almost 10,000 pages. Most of this material has been in its possession since before the trial ended some two years ago.

3. Dr. Karadzic and his Legal Advisor Peter Robinson are continuing to review these voluminous new disclosures on a full time-basis. Dr. Karadzic is filing this motion based on his review of the material after 26 February 2016.

Karadzic statements to UN Security Council Members

4. Item #1 is a 26 April 1993 report of statements made by Dr. Karadzic when he met with members of a delegation of the United Nations Security Council on that day in Belgrade.¹ The report has apparently been in the possession of the prosecution for many years. It was not disclosed to Dr. Karadzic until 15 February 2016.

5. In the report, Dr. Karadzic is quoted as having made a commitment not to enter Gorazde and Zepa and having proposed UN military monitors to be stationed along the front lines to verify the ceasefire. Dr. Karadzic further indicated that the Bosnian Serbs were willing to have Muslims and Croats living with them in mixed areas. He also said he would issue strong orders for unimpeded passage of humanitarian convoys, the restoration of water services to Srebrenica, and entry of doctors there.

6. The exculpatory nature of this information is that it contradicts the prosecution's case that Dr. Karadzic was part of a joint criminal enterprise to expel Muslims and Croats from Serb-held areas of Bosnia and to eliminate the Muslims of Eastern Bosnia or to make life unbearable for them.²

7. Dr. Karadzic was prejudiced by the prosecution's failure to disclose this information. Had the prosecution timely disclosed the statement, Dr. Karadzic could have sought admission of the document from the bar table, or introduced it during his

¹ The report of this meeting is Annex A.

² *Indictment*, para. 14(a)(d)(e)

cross examination of prosecution witnesses, such as Piers Tucker, or through defence witnesses such as Vere Hayes, who testified about the 1993 Srebrenica events.

8. It is astounding that a patently exculpatory statement by the accused himself could go undisclosed for such a long period of time by the prosecution.

9. In addition to making a finding that the prosecution violated its obligations under Rule 68, Dr. Karadzic requests, as remedial measures, that the Trial Chamber (1) allow Dr. Karadzic to reopen his defence case admit the report from the bar table,³ or by allowing him to call one of the participants of the meeting to testify; and (2) draw an adverse inference to the prosecution on the issue affected by its disclosure violation and infer from the disclosure violation that the 1993 events concerning Srebrenica were not part of any plan to expel or eliminate the Bosnian Muslims.

Statement of General Mladic

10. Item #2 is a report of a 21 July 1995 interview by General Mladic by a journalist.⁴ The report has apparently been in the possession of the prosecution for many years. It was not disclosed to Dr. Karadzic until 15 February 2016.

11. In the interview, General Mladic states that the VRS was currently interrogating Muslim troops and policemen in Potocari and Bratunac and those who did not commit war crimes would be released. Those suspected of war crimes would be put on trial. He repeated that all civilians who want to stay in Srebrenica could stay.

12. The exculpatory nature of this interview is that it contradicts the prosecution's evidence that there was a plan to exterminate the Muslims of Eastern Bosnia and that the population of Srebrenica was forcibly transferred. It corroborates Dr. Karadzic's case that he was informed that the purpose of taking prisoners after the fall of Srebrenica was to screen them for war crimes and that he was informed that the civilian population of Srebrenica was not forced to leave Srebrenica.

13. Dr. Karadzic was prejudiced by the prosecution's failure to disclose this information. Had the prosecution timely disclosed the interview, Dr. Karadzic could have introduced the document during his cross-examination of prosecution witnesses or

³ The document fits into Dr. Karadzic's case because it corroborates the defence that there was no plan to expel Muslims and Croats from Serb areas of Bosnia nor any plan to eliminate the Muslims of Eastern Bosnia.

⁴ The interview report is Annex B.

direct examination of the various defence witnesses who testified about the 1995 Srebrenica events.

14. In addition to making a finding that the prosecution violated its obligations under Rule 68, Dr. Karadzic requests, as remedial measures, that the Trial Chamber (1) allow Dr. Karadzic to reopen his defence case to recall Momcilo Krajisnik, who can testify that this report was consistent with what General Mladic reported to the Bosnian Serb political leadership; and (2) draw an adverse inference to the prosecution on the issue affected by its disclosure violation and infer from the disclosure violation that Dr. Karadzic was informed that the purpose of taking prisoners after the fall of Srebrenica was to screen them for war crimes and that the civilian population of Srebrenica was not forced to leave Srebrenica.

Vice-President Plavsic's Order

15. Item #3 is an order dated 28 October 1992 signed by Biljana Plavsic indicating that the Presidency of Republika Srpska orders all civilian and military institutions in Republika Srpska to ensure the free and unobstructed movement of humanitarian aid convoys.⁵ The order has apparently been in the possession of the prosecution for many years. It was not disclosed to Dr. Karadzic until 1 March 2016.

16. The exculpatory nature of the order is that it contradicts the prosecution's case that Dr. Karadzic directed and/or authorized the restriction of humanitarian aid to Bosnian Muslim and/or Bosnian Croat enclaves located in territory controlled by Bosnian Serb Political and Governmental Organs and/or Bosnian Serb Forces in an effort to create unbearable living conditions for these inhabitants in furtherance of the objective of the joint criminal enterprise.⁶

17. Dr. Karadzic was prejudiced by the prosecution's failure to disclose this document. Had the prosecution timely disclosed the order, Dr. Karadzic could have had it admitted from the bar table or during his cross-examination of prosecution witnesses who testified about the restriction of humanitarian aid, such as David Harland.

18. In addition to making a finding that the prosecution violated its obligations under Rule 68, Dr. Karadzic requests, as remedial measures, that the Trial Chamber (1)

⁵ The order is Annex C.

⁶ *Indictment* at para, 14(j)

allow Dr. Karadzic to reopen his defence case admit the order from the bar table,⁷; and (2) draw an adverse inference to the prosecution on the issue affected by its disclosure violation and infer from the disclosure violation that the Bosnian Serb leadership never had the objective to create unbearable conditions of life for the Bosnian Muslims or Croats or to force them to leave.

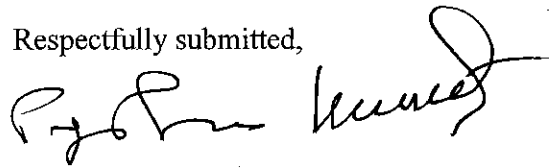
Other Remedies

19. The latest developments chronicled in this and the other disclosure violation motions filed since the conclusion of the trial demonstrate that the prosecution's violations of its disclosure obligations continue unabated. To receive 10,000 pages of previously undisclosed exculpatory material on the eve of the issuance of the Trial Chamber's judgement is unprecedented. It is a clear demonstration that the Trial Chamber's passive approach to the prosecution's violation of its disclosure obligations has not worked.

20. Dr. Karadzic requests that the Trial Chamber hold an evidentiary hearing to determine why the prosecution has failed to comply on multiple occasions with Rule 68 and the Trial Chamber's deadlines and to assure itself that all exculpatory material has been disclosed before issuing its final judgement. Otherwise that judgement will be unsafe.

Word count: 1449

Respectfully submitted,



Radovan Karadzic

⁷ The document fits into Dr. Karadzic's case because it corroborates the defence that there was no joint criminal enterprise to create unbearable conditions of life for the Bosnian Muslims or Croats or to force them to leave.

ANNEX "A"

~~7401-8734~~
Note for the file

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**Subject: Meeting of the Security Council Delegation
with Dr. Radovan Karadzic**

Belgrade Airport, Monday, 26 April, 1993

1. The Head of the Delegation (Venezuela) opened the meeting by explaining the purposes of the mission of the Security Council to former Yugoslavia. In accordance with Security Council Resolution 819, the mission was collecting facts on the situation in eastern Bosnia in particular, as well as in central Bosnia. He underlined that the delegation was meeting with all key leaders to the conflict.
2. Dr. Karadzic spoke at length about, what he called, the "fears Serbs have of living as a national minority under Muslim domination". He noted that suspicion and distrust were key elements in the present conflict and needed to be directly addressed. He felt that the international community had failed to understand the complexity of the conflict and, therefore, had tended to be biased in its approach to it. He would have hoped that the Security Council delegation had had the opportunity to speak, not only to one side (Muslim) but also to the other side (Serb). In that context, Dr. Karadzic hoped that the Serb side would, in the future, be able to show to the international community the consequences of Muslim action against Serbs in eastern Bosnia. He gave examples of Serb villages where Muslims had committed massacres against Serbs, i.e., Kamenica. Local Serb commanders were ready to show any time the results of these horrors on the ground.

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3. Dr. Karadzic showed, through a series of maps, how the exchange of territories/population had taken place over time, and how Serbs were ready to trade land in order to maintain the continuity of their territory. Turning to the issue of interim arrangements, he said that the safeguards built into those arrangements guaranteed nothing as the original constitution of Bosnia and Herzegovina (B-H) included such guarantees and, yet, they [the guarantees] were bypassed when B-H became independent.
4. He spoke passionately about the fact that Serbs wanted to stop the war but the Muslims continued their military provocations against the Serbs. In his view, the Muslims had no interest in stopping the war now as they were hoping for a military intervention. In addition, the position of the international community was exacerbating the current situation as pressure was being applied on one side only. Therefore, the Croat and the Muslim sides would have no interest in stopping the war as there was no international pressure on them. In the end, Serbs were "trapped by this war". To underline his point, the world had the notion that the Serbs had invaded B-H but failed to acknowledge that Serbs lived in B-H before the war began.
5. The Head of the Delegation (Venezuela) commended the predominance of reason in Dr. Karadzic; he hoped that such a reasonable attitude by a leader (Dr. Karadzic) would be helpful in solving the conflict in B-H by peaceful means. He underlined that the mission was in the AOR to collect facts; to visit Srebrenica; to see the situation there for themselves, not to prove that Serbs had killed Muslims. He noted that some Serb commanders on the ground had attempted to block the mission's path in Srebrenica (hostile and menacing gestures with submachine guns). All in all, he wanted to point out that this type of harassment by Serbs against the Security Council delegation tended to strengthen the view of Serbs as intransigent, stubborn and violent people.

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6. The Head of the Delegation outlined some of the main problems they had found at Srebrenica: (1) Medecins San Frontieres doctors are not being allowed to deploy; (2) tents destined for Muslim refugees have been confiscated; (3) the lack of water is a serious problem and could exacerbate the already critical health/hygienic conditions in Srebrenica and its surroundings. He pointed out that, although the ceasefire was holding, Serbs remained at their positions on the highest points surrounding Srebrenica. Furthermore, the Security Council Delegation was concerned about future developments in Gorazde and Zepa. Dr. Karadzic stated that unless Serbs were attacked in those areas, Gorazde and Zepa would remain as they are, at present. He made the commitment that "Serbs would not enter Gorazde and Zepa."

7. Dr. Karadzic proposed to place military monitors along the Serbian and Muslim lines so as to closely verify the ceasefire. The Serb side was willing to fund some of the cost of deploying troops along those lines. He considered that if the above concept worked in Srebrenica, it could be later tested in Gorazde and Zepa. If the process moved along this path, there could be a cessation of hostilities. He stressed that the presence of monitors would be essential to rebuild trust and confidence since mutual suspicion was deeply rooted in both the Serb and Muslim communities.

8. The representative of New Zealand recalled the agreement just reached between Presidents A. Izetbegovic and F. Tudjman and noted that, in that context, the Serb position would become untenable. He wondered whether, in his concern for Serb areas in the Vance-Owen maps, Dr. Karadzic was really speaking of exclusively Serb rather than mixed areas. In his opinion, the Croats and the Muslims were ready to live in mixed communities. Dr. Karadzic answered that to him mixed areas were acceptable. He pointed out that the Serb side had been in favour of the Lisbon proposal (March 1992) which had been, unfortunately, dealt a blow by the

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premature recognition of the Republics of Croatia, Slovenia, and later, B-H. He felt that the Serb side could join the Coordination Group agreed on by Croatia and B-H. He was not sure that a joint military command was possible, at this time. At any rate, a decision on the Vance-Owen peace plan would now have to be made through a referendum of the Serbs in "Republic Srpska", to be held on 15-16 May, 1993.

9. The representative of France wondered whether the deployment of monitors along the Muslim and Serb lines could lead to total demobilization and to a "pacification process". Dr. Karadzic considered that it was worthwhile to think about that idea.

10. The representative of Hungary hoped for the demilitarization of the entire country (B-H) if the idea mentioned above was put into practice. He stressed the integrity and immutability of B-H. He warned about the dangers of historical parallels in reference to the historical maps shown by Dr. Karadzic. Specifically, he linked the situation of Hungarians and Serbs in Vojvodina and what the implications would be if those two peoples went back to the territories in which they originally lived. Dr. Karadzic pointed out that in former Yugoslavia the borders were placed for administrative reasons; they were not political boundaries. The Serbs accepted to live with Croats and Muslims as long as Yugoslavia existed as a state.

11. The representative from the Russian Federation inquired about Dr. Karadzic's view on the humanitarian situation in Srebrenica, particularly regarding water and electricity. Dr. Karadzic pointed out that, while the international community was focused on atrocities committed by Serbs - and he did not deny them - the Serb side had evidence regarding atrocities committed by Muslims in Serb villages. He mentioned that these facts had been brought to the attention of the Commission on War Crimes and, its leader, Mr. Karlshoven, had said that the Commission lacked

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sufficient funds to undertake all necessary enquiries. Dr. Karadzic made three commitments regarding humanitarian issues in Srebrenica: He would immediately give strong orders for (a) the unimpeded passage of humanitarian convoys; (b) the restoration of water services to Srebrenica; and (c) the entry of MSF doctors, although he did indicate some negative comments on their behaviour. Furthermore, Dr. Karadzic promised that convoys would be allowed to go to Tuzla, Gorazde, and Sarajevo.

12. The Head of the Delegation said that the information provided by Dr. Karadzic would be presented objectively to the Security Council. While welcoming the engagement of Dr. Karadzic in the political process of the negotiations on B-H, he hoped that Dr. Karadzic would succeed in re-engaging the political will of his people. He also hoped that, as a gesture to the Security Council delegation, the commitment made by Dr. Karadzic on the restoration of the water supply to Srebrenica would be carried out immediately, as promised. Otherwise, the political results of this discussion would be wasted.

13. Dr. Karadzic thanked the Delegation; emphasized his willingness to invite the Security Council members to visit Serb-controlled areas; renewed his hope for impartiality on the part of the delegation; and finally, underlined his desire to continue cooperation with UNPROFOR (Dr. Karadzic noted that the Serb side was not publicizing irregularities committed by UNPROFOR contingents, i.e. Ukrainian/Egyptian.)

14. The meeting took place in a cordial, respectful and measured atmosphere.

AS/A-CAC
UNPROFOR Belgrade

ANNEX "B"

R035-6889

====> Rule 70 and other restrictions apply <====

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====> Contact the Rule 70 Custodian <====

Daily Report AU2407205395 FBIS-EEU-95-142 950725 Vol II No 142
 Daily Report 1 BOSNIA-HERZEGOVINA 3
 East Europe UNCLASSIFIED Serbo-Croatian 950721
 Belgrade SVET Gen Mladic Views Taking of Srebrenica Fall
 AU2407205395 Belgrade SVET in Serbo-Croatian, 21 Jul 95 p 1

[Interview with Ratko Mladic, Bosnian Serb military commander, by Zeljko Markovic in Pale; date not given: "By Fall, We Shall Take Zepa, Gorazde, Bihac, and Finally Sarajevo, and Bring the War in Bosnia to a Close!!!"] [FBIS Translated Text] When I visited Pale for the third time this weekend, I did not get the impression that the capital of the Serb Republic reminds one of "Twin Peaks, a small town full of paranoid murderers," as it was described by a journalist in the latest issue of the American NEWSWEEK. The atmosphere of unusual serenity and peace, without overly euphoria because of the taking of Srebrenica by Serb forces, is the basic characteristic of the mood in Pale these days. I met the commander of the Army of the Serb Republic, General Ratko Mladic, immediately after the Srebrenica operation, so, in our conversation, we did not refer to the subsequent events surrounding Zepa.

[Markovic] Mr. General, why did your army launch the latest offensive aimed at taking of Srebrenica, and were you aware of possible consequences for you from the international community?

[Mladic] The taking of Srebrenica was a sheer military action that the Army of the Serb Republic should have taken a long time ago. Everybody knows, and it can be confirmed by the Dutch soldiers, that, in the past month, the Muslim army was launching actions and attacks from that enclave against Serb civilians in the area around Srebrenica. In the past several days alone, we had 10 or so dead civilians who were killed by Muslim soldiers from Srebrenica. If that is, as it is said, a safe zone, then there are no military or human reasons to attack and kill Serb civilians from such a zone and to have the criminals return to the safety of the safe area after such actions.

[Markovic] How many casualties did the Serb Army sustain in that operation?

[Mladic] Very few. There was almost no resistance. I can say freely that the civilians were happy to see us coming, since they had had enough of living in the closed enclave, far from their fellow citizens. The Muslim troops and police offered weak resistance, and the majority of them immediately took their uniforms off and changed into plain clothes in order to mix in with the civilians. We are interrogating such people now in Potocari and Bratunac, and all those that we establish did not commit any war crimes against Serb civilians will be released to go to central Bosnia, just like the other civilians.

[Markovic] And what about those whose innocence is not proven?

[Mladic] They will be tried according to the laws of the Serb Republic.

[Markovic] In what way were the civilians treated?

[Mladic] The first group of civilians has already been transferred to the demarcation line in the direction of Kladanj, and I believe they have already safely arrived in Muslim territory.

[Markovic] What will happen now in Srebrenica?

[Mladic] What do you mean, what will happen? What has to happen will happen! We shall establish the authority of the Serb Republic and restore normal life. We

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have said that all civilians who want to stay there can stay. This applies to UNPROFOR [UN Protection Force] troops as well.

[Markovic] The civilians, however, have chosen to go.

[Mladic] Well, that is also normal. Birds of a feather flock together.

[Markovic] How will you act if the UN Security Council approves NATO's use of force to expel the Serbs from Srebrenica, if it comes to a new bombardment?

[Mladic] We shall not leave Srebrenica ever again, and no Security Council or NATO can make us do so. Srebrenica has been Serb territory for ages, and it will remain so. Why did not they compel the Croats to withdraw from western Slavonia after their aggression? As for NATO aircraft, we have already got used to them, we have got used to their bombarding us as well. None of their air strikes can harm us. This is our land, and we are familiar with every single inch of it. Neither aircraft, nor bombs can change that!

[Markovic] How did the Dutch UNPROFOR soldiers react when you treated them with champagne at their camp in Potocari?

[Mladic] They were happy, just like me. They were also fed up with life in that "safe area." They told me they had had a lot of trouble with the Muslim police and their gangs, who looted everything all over the place. They were happy that we came.

[Markovic] Let us recall one month earlier, when the issue of UNPROFOR soldiers taken prisoner by the Serbs was topical. What is your view of the event?

[Mladic] That was an unpleasant situation, but it was, unfortunately, the only way to make it clear to Europe and the world that they cannot shell Serbian civilians and hospitals whenever somebody feels like doing so.

[Markovic] Did you contact Mr. Stanasic, chief of the State Security Service of Serbia, during the negotiations on the soldiers' release?

[Mladic] Yes, I did.

[Markovic] Can you tell me some more about those contacts of yours?

[Mladic] No! I am an officer, and I know that there are certain things that are not discussed for newspapers.

[Markovic] Since when have you known Stanasic?

[Mladic] We have known each other from Belgrade. He is a great professional, an honorable man and real patriot.

[Markovic] Are the stories true, according to which Stanasic, when he came to Pale, said to Karadzic: "Radovan, Milosevic is sending you word that, if you do not release them, something really bad will happen to you!"

[Mladic] I do not want to comment on such stories and gossip.

[Markovic] What are your personal relations with Karadzic like?

[Mladic] Normal and correct. What are the relations between the president of the republic and the Army commander supposed to be like?

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[Markovic] It is being rumored that at the meeting of the Assembly of the Serbian Republic in Sanski Most you severely criticized Karadzic and demanded that he give the Army full freedom of action?

[Mladic] I repeat that I do not want to discuss what is being rumored, what one has said to the other, and such things. I had certain objections regarding work performed by the civil authorities, but it is normal that in any state or system there are polemics. All misunderstandings have been cleared up, and the Army and the state are now working and acting as one.

[Markovic] Recently, before his arrest, Seselj stated that at a secret meeting at Milosevic's Radovan Stojcic Badza had ordered you to carry out a coup in the Serbian Republic.

[Mladic] That is not true.

[Markovic] What are your relations with Milosevic like?

[Mladic] Correct. He has done a lot for the entire Serbian people, and I hope that disputes between our two leaderships will be overcome soon.

[Markovic] In his interview for TIME, Milosevic said that you were the only person in the Serbian Republic's leadership who was exempt from the treatment of suspended relations, and that he saw you whenever you came to Belgrade.

[Mladic] I am not familiar with any such statement of his. But if he said so, then he thinks so. My family is in Belgrade, and I often go there to see them.

[Markovic] After everything that happened, how do you view the case of pilot O'Grady?

[Mladic] We did not have any reason to detain that pilot. We were satisfied to see his aircraft, by which Serbian objectives could have been bombarded, downed. We did not need the pilot.

[Markovic] Do you want to say that you knew his whereabouts?

[Mladic] I have told you what I wanted to say.

[Markovic] There have been many speculations regarding your absence from the wedding of Sonja Karadzic, daughter of the president of the Serbian Republic. Why were none of the military commanders present at the wedding?

[Mladic] I can only speak on my behalf. I am generally not fond of such celebrations or parties, regardless of who is in question. Since we had a family tragedy, since our Ana [his daughter] is gone, I think it is normal that I avoid parties, and that any other answer would be superfluous.

[Markovic] How do you personally view the border at the Drina?

[Mladic] How do you think a real Serb could view it at all? Why are you asking me such questions at all? That horrible division has been the greatest blow in my life. Therefore I think that the Serbs will do anything to have that blockade lifted. We have had enough of war, not because we are afraid or tired, but because we have seen so many terrible things in the past three years. The goal of both the leadership and the people of the Serbian Republic is to bring the war to a close, to have the blockade on the Drina lifted, and to start reconstructing our country.

[Markovic] What ought to be done to achieve that?

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[Mladic] First, the West should understand something: That the Serbs cannot be bombarded without taking consequences for that, that the Serbs cannot be forced into herds, that nobody can invent maps for us that will carve up and parcel out our Serbian land that has existed for centuries, and that a compact territory has to be given to us in which we can function normally like a state.

At the same time, the Muslims must understand that the unitary Bosnia with Sarajevo as its capital from which Alija Izetbegovic would govern cannot be and will never be. They have to observe cease-fires. They must not attack Serbian villages or civilians from their "safe areas," or else they will have another Srebrenica. If they fail to understand this, if they continue behaving like this, by fall we shall take all those enclaves in eastern Bosnia, that is, Zepa, Gorazde, and we shall also take Bihac, and if necessary even Sarajevo as well, and thereby bring this war to a close. If, after three years of warfare against Serbs, it is still not clear to the Muslims that they are not able to defeat us on the battlefield, then it is a great tragedy for their people, and their leaders will be responsible for the deaths of additional hundreds and hundreds of young men who are recklessly storming our positions and being killed like flies. I wish you could see how it looked during their latest offensive around Sarajevo. Their soldiers were falling dead in clusters in front of our trenches. The Serbs know what they are fighting for. They know that they are defending their land, and for that reason they are invincible.

[Markovic] How is your army getting supplied with fuel and spare parts for arms and armored vehicles? Has that not become a problem for you since the imposition of the blockade at the Drina?

[Mladic] Yes, it is a great problem. Nevertheless, there are always different ways of dealing with it. Still, we are certainly in a much more difficult position than the other two sides in the conflict. The Croats are getting arms from Croatia without problems. The Muslims are being supplied by Arabs and Turkey, and they are getting arms through secret UNPROFOR channels as well....

[Markovic] It is being rumored that trade is blooming, that Serbs themselves are selling arms to Muslims. Rumors also say that Srbobran is the main center for that, and that the forces of the 5th Corps in Bihac are being supplied by smugglers from the Republic of Serbian Krajina....

[Mladic] Unfortunately, I have to say that such occurrences accompany any war. There are also such Serbs who care more about money, expensive cars, or villas, than about their people, so they are selling arms to the enemy by which he will be killing their brothers later. In any war there are such examples, but we are making efforts to severely deal with such occurrences wherever they come forth and punish people involved in such activities.

[Markovic] In Serbia the forced mobilization of refugees has caused great outrage. How many draftees have been recruited in your army in such a way so far, and is it true that they are being sent on the front without previous training?

[Mladic] Any man who flees and leaves his elderly parents and neighbors to defend his home from the enemy is a miserable human wretch, and there is no more to be said about it. Those who have been sent back to us from Serbia, who fled across the Drina to smuggle goods and acquire fortune there while their brothers were being killed here, will be deployed in units according to our war scheme. It is not true that they are being sent on the front without previous training. Nobody in the Army of the Serbian Republic has ever been sent on the front without training. They are attending regular training, while those who we think will not be of much use on the front can serve the Army and the people as good as those on the front. They can peel potatoes in the rear.... There is enough work for everybody.

R035-6893

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ANNEX "C"

CZN 322 6/18

REPUBLIC SRPSKA
PRESIDENCY

Ref. 01-10923E
Pale, October 28, 1998

TO ALL CIVILIAN AND MILITARY INSTITUTIONS
OF THE REPUBLIC SRPSKA

The Presidency of the Republic Srpska orders to all civilian and military institutions on the territory of the Republic to ensure free and unobstructed movement of convoys and delegations of the UN High Commissioner for Refugees, who will distribute humanitarian aid or mediate in the distribution. The High Commissioner for Refugees of the UN undertakes to notify their movement and the obligation of the Republic Srpska is to provide timely and reliable escorts on the territory of our Republic.



Biljana Plavšić
Biljana Plavšić, D.Sc.
(MEMBER OF PRESIDENCY)

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0172-2856