

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: 3 March 2014

THE PROSECUTOR

v.

RADOVAN KARADZIC

*Public*

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88th MOTION FOR FINDING OF DISCLOSURE  
VIOLATION AND FOR REMEDIAL MEASURES  
(MARCH 2014)

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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 Rule 68 by failing to timely disclose exculpatory material. The prosecution has confirmed that the material has been in its possession, but was not disclosed until 17 February 2014.<sup>1</sup>

2. The material is a collection of official notes taken by the RS MUP in Prijedor during May-August, 1992 from Bosnian Muslims residing in Kamicani and Kevljani villages in Prijedor municipality. The notes document the arming and military-related activities of persons in those villages.<sup>2</sup>

3. The exculpatory nature of this material is that it (1) shows that the Prijedor SJB authorities were making a bona fide effort to identify persons engaged in criminal activity and were not simply targeting all Muslims in furtherance of the alleged joint criminal enterprise to expel Muslims from Serb-controlled areas of Bosnia; and (2) demonstrates from the content of the information provided by those interviewed that there was arming and other military-related activity in those areas, supporting Dr. Karadzic's contention that there was a legitimate reason for the military and law enforcement operations taken by the authorities in these areas in 1992, and that such actions were not part of a joint criminal enterprise to expel Muslims.

4. The prosecution has acknowledged in its disclosure letter and *Prosecution Periodic Disclosure Report* (17 February 2014)<sup>3</sup> that the material appears to come within Rule 68.

5. Dr. Karadzic has been prejudiced by the late disclosure of this document because he could have used the information in his cross examination of prosecution and defence witnesses who testified about the events in Prijedor municipality, and could have sought to interview the persons who made the statements and called them as defence witnesses. By failing to disclose the material until the end of the defence case, the prosecution caused prejudice to Dr. Karadzic.

6. It is respectfully requested that the Trial Chamber make a finding that the prosecution has violated Rule 68 by failing to timely disclose this material.

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<sup>1</sup> A redacted copy of the letter of disclosure is attached as Annex A".

<sup>2</sup> A copy of the Official Notes is attached as Annex "B".

<sup>3</sup> para. 7, fn. 6

7. These violations demonstrate that the prosecution had not disclosed all of the exculpatory information in its possession despite repeated admonitions by the Trial Chamber and despite all of the mechanisms it claimed to have put in place to detect and disclose exculpatory material.

8. Additional violations are expected to be uncovered since this disclosure was missed by the prosecution trial team in our case and there can be no assurance that other exculpatory material has not been missed.

9. Dr. Karadzic requests that the Official Notes be admitted as an exhibit as one remedy for the disclosure violation.

10. Dr. Karadzic once again renews his request that the Trial Chamber order that the defence be given open-file disclosure, as the violations of the prosecution's disclosure obligations continue to be uncovered. Only full disclosure can ensure a fair trial.

Word count: 588

Respectfully submitted,

Radovan Karadzic

# **ANNEX “A”**



United Nations  
Nations Unies



International  
Criminal Tribunal  
for the Former  
Yugoslavia

Tribunal Pénal  
International pour  
l'ex-Yougoslavie

Office of the  
Prosecutor

Bureau du  
Procureur

Case No. IT-95-5/18

17 February 2014

**Disclosure Batch 1405: Disclosure of relevant Materials pursuant to Rule 68**

Please find enclosed the items detailed below for delivery to the accused Mr. Radovan Karadžić. These materials are relevant in the case. You may consider part of this material to be potentially exculpatory.

We would appreciate acknowledgement of receipt of the material by signature and returning the signed receipt to our office.

The Prosecution also wishes to remind the Accused of the terms of non-disclosure detailed in the Trial Chamber "Decision on Prosecution Motion for Non-Disclosure" dated 02 September 2008 and the "Decision on Protective Measures for Witnesses" dated 30 October 2008.

Yours sincerely,

Hildegard Uertz-Retzlaff  
Senior Trial Attorney

1 CD entitled "Disclosure Batch 1405 – Rule 68 Material" containing the material listed below:

| Description  | Date | ENG ERN | BCS ERN             | Comment   |
|--|------|---------|---------------------|---|
| Collection of documents re official note re interview with FAZLIC Jusuf no 11-12-02-2 Author: Authorized Official, Prijedor Public Security Station Category: Military |      |         | P000-1222-P000-1234 | Note: The information contained within this item is similar in content to the previously disclosed statement of Dzevad KENJAR under ERN P000-1370-P000-1370 |

# **ANNEX "B"**

Serbian Republic of Bosnia and Herzegovina  
MINISTRY OF THE INTERIOR SARAJEVO  
SECURITY SERVICES CENTRE  
BANJA LUKA  
PUBLIC SECURITY STATION  
PRIJEDOR

Number: 11-12-02-2

Date: 23 June 1992

#### OFFICIAL NOTE

Compiled following an interview with:

Jusuf FAZLIĆ, son of Sejdo, born 23 June 1933 in Kamičani village, plumber, residing in Ljubljana at Klapčičeva 2, employed at *Izolacija* in Ljubljana. He built a house in Kamičani and went into disability retirement 10 years ago. One month ago he came to Kamičani to take care of his fruit trees, garden, etc, that is how he came to be in the village. He has two sons in Prijedor, Emir and Ferid, who live in Puharsko, at Krajiških brigada Street. They are both employed, Emir at *Impro* and Ferid at *Mira Cikota*. They both have houses, where they live. A year ago Jusuf built a house and moved in, and from 1953 until last year he lived in Ljubljana. He and his wife surrendered when the call was made to surrender, together with the women, children and elderly on 29 May 1992. They were taken to Lamovita and from there to Omarska.

During the interview he said that a man called BAHONJIĆ had come from the SDA /Party of Democratic Action/ and that some kind of a meeting was held. He does not know what was discussed at the meeting or what decisions were made. He could not answer any of the questions he was asked, because he was occupied with dealing with his fruit trees and garden, so he could go back to Ljubljana and then visit occasionally to maintain his garden.

He only heard *from* KEŠIĆ that an NN /unidentified person/ was getting weapons from somewhere and selling them in the village. He said he did not know anything because he did not live there permanently and was not in touch with the rest of the population.

He said that his son, Emir, had been in the JNA /Yugoslav People's Army/ reserve the year before for 45 days in his RJ /war unit/.

Lately, he had seen active police officers, carrying weapons, from Kozarac pass by. They are both called ALIĆ, but he does not know their names. He does not know anything apart from the above.

Authorised Official

Serbian Republic of Bosnia and Herzegovina  
MINISTRY OF THE INTERIOR SARAJEVO  
SECURITY SERVICES CENTRE  
BANJA LUKA  
PUBLIC SECURITY STATION  
PRIJEDOR

Number: 11-12-02-2

Date: 30 May 1992

#### OFFICIAL NOTE

Compiled on 30 May 1992 following an interview with ~~Jusuf FAZLIĆ, son of~~

Hašim FORIĆ, son of Šerif, born 23 April 1926 in Kamičani, Prijedor SO /municipality/, residing in Kamičani, four years of primary school, labourer, retired from the *IVA KOP* construction company in Ivanjić Grad, married with five children. His sons: Šerif, resides in Zagreb and is employed at *Industrogradnja*. He is still there. Ekrem is together with Šerif. Hidajet lives in Kamičani and is employed at the *Mrakovica GIK* /construction engineering works/. His daughter, Ismeta lives in Rovinj with her husband, and Nisveta is married and lives in Kevljani, where her husband is from. He was captured in a shelter with several families on 29 May 1992.

During the interview he said the following:

He knows that Osman ALIĆ, an active police officer, came to check on police officers on duty. He knows that he saw ZENKIĆ in a patrol and carrying an AP /automatic rifle/. He went to Austria a few days ago. He heard that some man from Kozarac was getting and selling weapons in Kamičani for between 1,000 and 1,500 DM /German marks/, but he does not know who was selling or buying the weapons. He also knows, he heard that the defence positions were occupied in Gornji Jakupovi, in the border area towards the Serbian houses. The same happened in Jakupovci village. Those positions were occupied by the locals, and the main man organising everything was an army officer from Kozarac, but he does not know his name.

Some people wanted to surrender their weapons, but did not dare do so because of the others.

Authorised Official



Serbian Republic of Bosnia and Herzegovina  
MINISTRY OF THE INTERIOR SARAJEVO  
AUTONOMOUS REGION OF KRAJINA  
SECURITY SERVICES CENTRE BANJA LUKA  
PUBLIC SECURITY CENTRE BANJA LUKA  
PUBLIC SECURITY STATION  
PRIJEDOR

Number: 11-12/02-2  
Date: 14 August 1992

#### OFFICIAL NOTE

Compiled on 3 June 1992 following an interview with:

Senad OMERBAŠIĆ, son of Omer and Humra, née KAHRIMANOVIĆ, born 25 February 1960 in Kozaruša, PK /semi-qualified/ labourer at the *Pilana* in Kozarac, married with three children, residing in Kamičani bb /no number/.

Muharem ĆUSTIĆ and Tadija DEMIROVIĆ were making anti-tank barriers at the *Pilana*. They later used these for laying obstacles. I did not participate in any combat, nor am I a member of any army. When the sirens went off, I went into the basement with my family. My neighbours, Hamed KARABAŠIĆ, Ramiz ĆIRKIN and Kole were the main organisers of this rebellion.

Authorised Official

Serbian Republic of Bosnia and Herzegovina  
MINISTRY OF THE INTERIOR SARAJEVO  
AUTONOMOUS REGION OF KRAJINA  
SECURITY SERVICES CENTRE BANJA LUKA  
PUBLIC SECURITY CENTRE BANJA LUKA  
PUBLIC SECURITY STATION  
PRIJEDOR

Number: 11-12/02-2

Date: 3 June 1992

#### OFFICIAL NOTE

Compiled on 3 June 1992 following an interview with:

Maho VELIĆ, son of Feriz and Neka, née ALIŠIĆ, born on 6 January 1950 in Kevljani, driver by profession, employed at *Tempo* in Zagreb, married with four children, wife's name is Sadeta, née HADŽIĆ, permanently residing in Kevljani no. 148, has five brothers.

Ismet, born in 1966, is here.

Fikret, born in 1967, is here.

Husein, born in 1947, is in Rijeka.

Mehmed, born in 1953 in in Germany.

Dževad, born in 1962, is in Germany.

He is currently on the list of the Velići TO /Territorial Defence/ with his brothers, Ismet and Fikret.

It was not established whether he owned a weapon.

Authorised Official

Serbian Republic of Bosnia and Herzegovina  
MINISTRY OF THE INTERIOR SARAJEVO  
SECURITY SERVICES CENTRE  
BANJA LUKA  
PUBLIC SECURITY STATION  
PRIJEDOR

Number: 11-12/02-2  
Date: 13 August 1992

#### OFFICIAL NOTE

Edin KARČIĆ, son of Abdulah and Emina, née MEŠIĆ, born 5 March 1963 in Sarajevo, doctor by profession, paediatrician, employed at the *Jezero* children's clinic in Sarajevo, single, completed his military service in Novi Sad and Split in the medical corps, with no prior convictions, speaks English and German and as a child he spoke Urdu, the language used in Pakistan.

He said that he lived in Sarajevo at Lenjinova 127b, but he spent most of his time with his parents nearby. When it became tense in Sarajevo, his parents and brother went to stay with relatives in Prijedor, with Sulejman DELKIĆ at II. krajiškog korpusa 12. When the clashes broke out in Sarajevo, he was at work and worked non-stop for seven days. After this, the situation calmed down, he was given seven days of leave and came to Prijedor. He did not return to Sarajevo because the situation in the city had deteriorated, so he stayed in Prijedor until he was taken into custody. As a child and young man he spent time in Pakistan and East Berlin because his father worked as a representative of the empiricists /as printed/. His brother, Artad KARČIĆ was born in 1969 in Pakistan, now a medical student in Sarajevo, and is currently at the Omarska collection centre.

Authorised Official

Serbian Republic of Bosnia and Herzegovina  
MINISTRY OF THE INTERIOR SARAJEVO  
AUTONOMOUS REGION OF KRAJINA  
SECURITY SERVICES CENTRE BANJA LUKA  
PUBLIC SECURITY STATION  
PRIJEDOR

Number: 11-12/02-2  
Date: 14 August 1992

#### OFFICIAL NOTE

Compiled on 3 June 1992, following an interview with Hamed KENJAR, son of Hamdija and Emka, née SOFTIĆ, born on 1 January 1972 in Kamičani, a mechanic by profession, completed 10 months in the JNA /Yugoslav People's Army/, without prior convictions, married with no children.

During the interview he stated that on 18 December 1990 he went to the technical service of the JNA in Travnik and returned in September 1991. After this, he did not return to the army because he received a note from the TO /Territorial Defence/ saying that he did not need to. After that, he joined the Kozarac TO. He stood guard in his hamlet, and they had M-48 rifles. The checkpoints were established by Munib KENJAR, who also made the duty roster. He was their link with Kozarac.

Hamed KENJAR stated that he had surrendered after the surrender of the weapons together with his parents, brother, sisters and brother-in-law, Amir HADŽIĆ. They were taken to Prijedor by buses. He stated that he did not have a weapon, nor did anyone in his family. In the TO the following people had weapons: Munib KENJAR had an automatic rifle, Hilmija KENJAR an M-48 rifle and Suljo KENJAR an M-48 rifle.

He knows that Adem FAZLIĆ had an automatic rifle, and he was threatening the women and children not to surrender. A haulier called Vasif ALIHODŽIĆ from Kamičani also had a rifle. Samir KENJAR had a camouflage uniform and went to Kozarac without his family, from where he withdrew to Kozara with their army. During the interview it was impossible to establish whether Hamed KENJAR had a weapon and whether he participated in the armed operation.

Authorised Officials

Serbian Republic of Bosnia and Herzegovina  
MINISTRY OF THE INTERIOR SARAJEVO  
SECURITY SERVICES CENTRE  
BANJA LUKA  
PUBLIC SECURITY STATION  
PRIJEDOR

Number: 11-12-02-2

Date: 30 May 1992

#### OFFICIAL NOTE

Compiled on 30 May 1992 following an interview with:

Asim MEHANOVIĆ, son of Šefik and Hasima, née ŽERIC, born 22 October 1963 in Kozarac, electrical mechanic by profession, employed at the *ETD* in Banja Luka, father of two, married to Firdesa, permanently residing in Kevljani at number 394, completed his military service in 1985/1986 in Sombor. He has two brothers:

- Mirsad MEHANOVIĆ, born in 1969, has been in Ljubljana since 1982;
- Mirzet MEHANOVIĆ, born in 1971 and lives here.
- His father works in Germany, in Stuttgart.

Šerif JAKUPOVIĆ was the first one to organise guard duty in Kevljani. When things got tense, he fled to Germany and this role was taken over by Sakib POLJAK ... the role was taken over by the son /as printed/.

I am a member of the reserve police force and I handed over my automatic rifle. My neighbour and colleague Sead JAKUPOVIĆ did not hand over his rifle at the time, and I do not know where he is now.

- Kole and his men surrounded the police station in Kozarac at one point, and threatened to kill us if we signed the oath of loyalty. The people who did not wish to sign the oath of loyalty at the police station are the following:

1. Hamdija from Kozarac. I cannot recall his last name, he is an active policeman.
2. Ekrem HODŽIĆ, active policeman.

- Islam BAHUNJIĆ was putting the biggest pressure on the police not to sign the oath of loyalty, otherwise we would all have to move.

Commander Osme wanted /?to meet with us/ and asked us to sign the statements, otherwise there would no longer be any police in Kozarac. The people from the Territorial Defence were putting pressure on him at the meetings saying we must not sign it. From my village the following people are now in the TO:

1. Sead JAKUPOVIĆ, son of Nail
2. Edhem JAKUPOVIĆ
3. Nihad ELKASOVIĆ
4. Taib JAKUPOVIĆ
5. JAKUPOVIĆ, I do not know his name, aka Gara

Authorised Official

Serbian Republic of Bosnia and Herzegovina  
MINISTRY OF THE INTERIOR SARAJEVO  
SECURITY SERVICES CENTRE  
BANJA LUKA  
PUBLIC SECURITY STATION  
PRIJEDOR

Number: 11-12-02-2

Date: 30 May 1992

#### OFFICIAL NOTE

Compiled on 30 May 1992 following an interview with:

Ismet MEHANOVIĆ, son of Fadil and Suha, née SIVAC, born 20 October 1967 in Kevljani, by profession a mining mechanic, employed at the Omarska mine, permanently residing in Kevljani, bb /no number/, married with two children, completed his military service in 1986 in Kraljevo, mechanised unit, has one brother Firket, born in 1971 and is here. His father is in Germany, in Stuttgart. His wife is Bahrija, née SIVAC.

I was a member of the TO and had an M-48 rifle. My father works in Germany. I bought an old automatic rifle two months ago from Sead SIVAC, a vet from Kozarac, for 1,500 DM. There were also 150 bullets. Sakib POLJAK, who was the guard and platoon commander in the village, came to my house and told me that I had to give the rifle to the people who were on duty. I gave the M-48 rifle to Derviš MUJKANOVIĆ, son of Smail. I do not know where he went when the clashes started, or what happened with that rifle. I handed over the automatic rifle. A police car came with those people and we gave them our weapons. When the meeting was held at the centre in Kevljani, a man who said his name was ALIĆ came and told us not to surrender our weapons but to get organised and defend ourselves. Ilijaz HODŽIĆ was with him. The people holding the defence line under the road, at the crossroads in Jakupovići village are the ones who are here now. I do not know where their weapons are.

1. Suad JAKUPOVIĆ, son of Smail, AP
  2. JAKUPOVIĆ aka Gare, AP
  3. Jusuf JAKUPOVIĆ, reserve police force, PAP /semi-automatic rifle/
  4. Said JAKUPOVIĆ, light machine-gun
  5. Sead JAKUPOVIĆ, AP from the reserve police force
- A man called Didin, Zilhad BILAL and some others came to the village by trucks and opened fire when the clashes started.

- Three of my neighbours whom I did not see surrender:

1. Fehret DIDIĆ, son of Ramo
2. Said JAKUPOVIĆ, son of Salko
3. Mesud JAKUPOVIĆ, son of Mehmed
4. Derviš MUJKANOVIĆ, son of Smail
5. Fikret MUJKANOVIĆ, son of Smail

I heard that Bahrija KEŠIĆ from Kamičani brought weapons from Croatia by bus. Hamid HODŽA from Kamičani sold weapons. I know that he sold an automatic rifle to Esad MUJKANović.

Authorised Official

Serbian Republic of Bosnia and Herzegovina  
MINISTRY OF THE INTERIOR SARAJEVO  
SECURITY SERVICES CENTRE  
BANJA LUKA  
PUBLIC SECURITY STATION  
PRIJEDOR

Number: 11-12-02-2

Date: 30 May 1992

#### OFFICIAL NOTE

Compiled on 30 May 1992 following an interview with:

Bahrija MENKOVIĆ, son of Smajo, born on 12 February 1954 in Kamičani, residing in Kamičani, Mujani hamlet bb, driver, employed at the Ljubija RŽR /iron ore mines/, stated the following:

When the fighting started, he went with the other locals to the riverbank. The next day, he started walking through the woods with his wife, children and three neighbour women towards Bosanska Dubica. In Moštanica they were taken over by the Bosanska Dubica SJB /Public Security Station/.

In Mujani hamlet the village guards were organised by Kemal JASKIĆ, son of Mustafa. The following people had weapons:

- Fehim TURKANOVIC, son of Rifet, he had a short, old rifle
- Isak TURKANOVIC, son of Rifet, PAP
- Asim PJANIC, AP
- Ismet MUJANOVIC, hunting rifle
- Smaje MENKOVIĆ, old-fashioned pistol

He heard that the weapons were being acquired by khoja Hamid SOFTIC, but he does not know where the weapons are coming from. He accused the SDA of being to blame for all this, that it swore by peace and yet armed the people, which led to the war.

Amir BILHAN went to Kozarac as a courier, he does not know whom he went to see. He was carrying the news about the alleged attacks.

He worked at the RŽR until Friday.

Authorised Operative



Serbian Republic of Bosnia and Herzegovina  
MINISTRY OF THE INTERIOR SARAJEVO  
SECURITY SERVICES CENTRE  
BANJA LUKA  
PUBLIC SECURITY STATION  
PRIJEDOR

Number: 11-12-02-2

Date: 30 May 1992

#### OFFICIAL NOTE

Compiled on 30 May 1992 following an interview with:

Jasim JAKUPOVIĆ, son of Rasim and Halima, née JAKUPOVIĆ, born on 24 January 1967/ in Kevljani, locksmith, unemployed, residing in Kevljani at number 327, single.

Two men called Fikret PIDIĆ and Sakib POLJAK aka Sako went to see Captain Sejo in Kozarac, who gave them tasks for Jakupovići village. They went from house to house and told everyone that they needed to be on a duty service, otherwise their houses would burn down.

Jasmin JAKUPOVIĆ, my brother Adem JAKUPOVIĆ /and I/ realised that we had nobody to worry about and that nobody would attack us. As a result, we did not go. They said that as soon as the first round was fired, our house would burn down.

I have another brother, who is employed in Zagreb; he is at work there. He is not married.

In the entire village my brother and I were the only ones who did not join in. Almost the entire village was engaged in the defence of Kevljani and Kozarac. We realised that we could not stand up to the army and their weapons.

Authorised Operative

Serbian Republic of Bosnia and Herzegovina  
MINISTRY OF THE INTERIOR SARAJEVO  
SECURITY SERVICES CENTRE  
BANJA LUKA  
PUBLIC SECURITY STATION  
PRIJEDOR

Number: 11-12-02-2

Date: 30 May 1992

#### OFFICIAL NOTE

Compiled on 30 May 1992, following an interview with:

Husein JAKUPOVIĆ aka Hule, son of Himzo and Sadika, née PARATUŠIĆ, born on 26 January 1962 in Kevljani, Prijedor, labourer, married with two children.

In my village the main organiser in the SDA was Šefik JAKUPOVIĆ. He worked in Slovenia. They would call the meetings, and Šefik JAKUPOVIĆ and Galib JAKUPOVIĆ personally came to invite me. The meetings were held at the mosque.

- Asim MEHAN
- Halid MEHANOVIĆ, son of Abaz
- Nihat ELKAZ

Received or bought APs.

Authorised Official

Serbian Republic of Bosnia and Herzegovina  
MINISTRY OF THE INTERIOR SARAJEVO  
SECURITY SERVICES CENTRE  
BANJA LUKA  
PUBLIC SECURITY STATION  
PRIJEDOR

Number: 11-12-02-2

Date: 30 May 1992

#### OFFICIAL NOTE

Compiled on 30 May 1992 following an interview with:

Teufik GARIBOVIĆ, son of Sulejman and Mina, née DEUMIĆ, born on 10 June 1940 in Kamičani, Prijedor, driver, employed at *Tekol* in Maribor, has four children, resides in Kamičani at number 221.

- Sabiha SAKIĆ, married in Vrbanja to Suad
- Jasmin GARIBOVIĆ, 1965, Kamičani
- Sabahudin GARIBOVIĆ, 1969, Kamičani
- Armin GARIBOVIĆ, born in 1971 in Ljubljana

Islam BAHONJIĆ was the president of the SDA – a radical extremist.

- Bećir MEDUNJANIN aka Bećo, one of the top people in the SDA.

Ramzija ČIRKJIN trained the Green Berets and, together with Kolo, armed them.

- PI /passport/ seized.

Authorised Official

Serbian Republic of Bosnia and Herzegovina  
MINISTRY OF THE INTERIOR SARAJEVO  
SECURITY SERVICES CENTRE  
BANJA LUKA  
PUBLIC SECURITY STATION  
PRIJEDOR

Number: 11-12-02-2

Date: 30 May 1992

#### OFFICIAL NOTE

Compiled on 30 May 1992 following an interview with:

Vahid VELIĆ, son of Šerif and Đula, née IBRAHIMOVIĆ, born on 9 July 1953 in Kevljani, resides in Kevljani at number 102, completed eight years of OŠ /primary school/, blacksmith, owner of a blacksmith's shop with his father, married with one child (Jasmin, two years old), completed his military service, has three brothers: Irfan, 1964; Zaid, 1967; Vehid, 1977, all three of them and their father are here.

I have a locksmith's workshop here. I am not a member of any party, nor is anyone from my family. Nobody offered either my brothers, or my father or me to join any party. We are a poor family. Only my father and I work at the blacksmith's workshop. Vehid completed primary school now, and Irfan takes our products (brooms, etc) and sells them at the market. Zahid worked at *Tehnika* in Zagreb as a bar-bender for a few years until a month and a half ago. He is now at home and does not do anything. Before these clashes neither I, nor anyone in the family, had any weapons, nor did anyone offer us any because they knew that I had no money. Nobody visited us to give us any weapons. I know that the following people were in the TO: Šerif VELIĆ, son of Mehmed, was the squad commander (he has a drum-magazine automatic rifle) and four soldiers, who had M-48 rifles: Huso HODŽIĆ, Ramo PERVANIĆ, Fikret ALIŠIĆ and HODŽIĆ aka Bruki. Apart from them, the following people had rifles: Jasmin VELIĆ (automatic), Senad VELIĆ (PAP), Aćo JAKUPOVIĆ (automatic) and Samir KEVAC (automatic). As far as I heard, they bought these rifles in Kozarac, for between 1,500 and 2,000 DM. They stood guard in the village.

When the shooting started I was at home, as was my family, and we all fled to Rijeka. About 400 people were there. Someone heard the call for surrender on the radio, so *hodja* Asim found a white rug, tied it on a stick and we all went to the school and surrendered. All those whom I listed surrendered their weapons, as did some others who had pistols. As far as I know, none of these people opened fire.

Authorised Operative