

BOSNIA AND HERZEGOVINA
PROSECUTOR'S OFFICE OF BiH
SARAJEVO
Number: KT-RZ-44/08
Sarajevo, 5 June 2008

**COURT OF BOSNIA AND HERZEGOVINA
SARAJEVO
- Preliminary Hearing Judge -**

Pursuant to Article 35(2)(h), Article 226(1) and Article 227(1) of the CPC BiH, I hereby file the following

INDICTMENT

AGAINST:

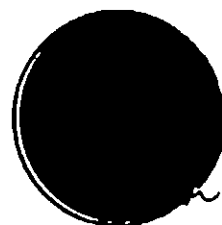
1. **BOŠKO LUKIĆ**, son of Mane, born on 25 November 1940 in Fajtovci, Ključ Municipality, with registered place of residence in Prijedor, 108 Vojvode Mišića Street, retired teacher, widower, father of two children, Serb, BiH citizen, Personal Identification Number: 2511940102385, in custody since 20 March 2008 under the Decision of the Court of BiH number X-KRN-05/119.
2. **MARKO ADAMOVIĆ**, son of Dušan and Jeka, born on 28 February 1946 in Peći, Ključ Municipality, with residence in Banja Luka, Petra Velikog Street next to number 66, married, father of two children, retired career serviceman, decorated with the Order of Miloš Obilić in 1994, Serb, Personal Identification Number: 2802946102381, in custody since 20 March 2008 under the Decision of the Court of BiH number X-KRN-05/119.

because:

From April 1992 until late December 1992, during the armed conflict in the Republic of Bosnia and Herzegovina, when the Army of Republika Srpska and the police of the Ministry of the Interior of Republika Srpska directed a widespread and systematic attack against the Croat and Muslim civilian population with a view to realizing the Strategic Objectives of the Serb People in the Republic of Bosnia and Herzegovina and with the priority "to establish state borders with the other two ethnic communities", which would be achieved by linking Serb-populated areas together, taking control of those areas and creating a separate state of Bosnian Serbs, from which the majority of the non-Serb population would be permanently displaced, the municipality of Ključ being planned to constitute a part of it, knowing that with their actions:

1. They participated in the preparation, organization and carrying out of a widespread and systematic attack directed against the non-Serb civilian population in the Ključ Municipality area in the way that Boško Lukić since late October 1991 and Marko Adamović since January 1992, as active and accomplished members of the Serb Democratic Party /SDS/ in Ključ, accepted the offered positions through which they implemented the party conclusions, and Boško Lukić, in his capacity as the Commander of the Municipal Territorial Defense Staff, and Marko Adamović, in his capacity as the Deputy Commander of the Ključ Battalion of the Territorial Defense, aware that in this way they became members of the Ključ Municipality Crisis Staff, as the supreme authority in the municipality during the war, and Boško Lukić a member and Marko Adamović the Commander of the Town Defense Command, in complicity and in agreement with Jovo Banjac, Veljko Kondić, Vinko Kondić, Drago Samardžija, Jovo Malbaša, Gojko Đukić, Tihomir Dakić, Slobodan Jurišić, Rajko Kalabić, Ljuban Bajić, Dragan Smiljanić, Ljuban Jovičić and other leaderships in the military and civilian authorities in the Ključ Municipality, they participated in a joint criminal enterprise with a plan to undertake all activities at the Ključ Municipality level so that Serbs completely take over the power in the municipal institutions, whereby the Municipality of Ključ would be included in the category of Serb municipalities and then join the Autonomous Region of Krajina and the Republic of the Serb People of Bosnia and Herzegovina, fully aware that the joint criminal enterprise would necessarily or as a natural and acceptable consequence lead to the commission of criminal offenses

against the Croat and Muslim civilian population and their property, by their acts and omissions to act they planned, prepared, instigated, ordered and perpetrated or otherwise incited and aided and abetted in the planning and execution or failed to take the necessary and reasonable measures to prevent or punish their *de jure* and *de facto* subordinates, over whom they had effective control, for the perpetration of the criminal offenses, although they knew or had reason to know that their *de jure* and *de facto* subordinates would commit or had committed those offenses, they played an important role in the joint criminal enterprise in the way that they participated in the preparation and establishment of a new system of power in the Ključ Municipality, on behalf of which Boško Lukić, as the Commander of the Municipal Territorial Defense Staff, already since October 1991, in accordance with the SDS order, engaged in the recruitment and formation of territorial defense units, and in their armament and preparation for combat operations including, as part of those activities, the formation of a monoethnic territorial defense by calling on Croat and Muslim reserve territorial defense members to return military equipment, while Marko Adamović, as a reserve captain and the Deputy Commander of the Ključ Battalion of the Territorial Defense, since April 1992, undertook activities to prepare the units for the attack against the civilian population in the municipality, and as members of the Crisis Staff and the Town Defense Command, they continued with the preparations for the joint criminal enterprise in order to ensure and take over the power in the municipality in the way that on 7 May 1992 they secured the access roads to the town and the Public Security Station building with the Territorial Defense units and the 6th Sana Brigade units in order to assist the Chief of the Public Security Station, Vinko Kondić, in the safe formation of the monoethnic police, and since then until 21 May 1992 non-Serb police officers were disarmed and dismissed from their posts; together with other members of the Crisis Staff and the Town Defense Command, they had *de facto* and *de jure* control over the police and the territorial defense, which participated in the joint criminal enterprise and planning by coordinating and ordering activities within a widespread and systematic attack against the civilian population by artillery and infantry and in the displacement of the non-Serb population so that the creation and survival of the Serb Republic of Bosnia and Herzegovina and the unification of all Serb territories would not be threatened, which resulted in the following:



- 1.1. On 27 May 1992, as part of the power takeover by the Serb forces, the army and the police started unlawfully arresting and depriving of liberty non-Serb civilians in the town centre of Ključ, bringing them to the Public Security Station, where they were exposed to physical and mental abuse by police members and various investigators, and imprisoning them in the Public Security Station detention cells, while a day or two later at least 22 civilians, including

[REDACTED]

[REDACTED] were transported to the Stara Gradiška camp, and died as a result of beatings on the way to the camp, while others were beaten during their reception into the camp and their stay there, and approximately fifteen days later they were transferred to another camp on Manjača,

- 1.2. On 28 May 1992, the Ključ Battalion, assisted by the 30th Partisan Division of the Yugoslav People's Army /JNA/, launched an artillery attack on the Ključ settlements Pudín Han and Velagići, inhabited by the Muslim population, where there were no legitimate military targets, which lasted for at least two days, while the shelling caused death of at least 12 persons, including

[REDACTED] after the shelling, the population was called to gather near the Community Center in Velagići, and when several hundred women, children and men came in front of the Centre, they were ordered to go in front of the Ključ Public Security Station, and then they were stopped at a police checkpoint near the ROPS and taken to the Šip warehouse in the immediate vicinity, where their property was seized from them, the men were separated from the women and children, and then the women and children were released without a right to return to their homes, while the men were registered and interrogated, and some of them were released to go home from there, while more than 200 of them were unlawfully deprived of liberty and imprisoned in the primary school *Nikola Mačkić* in Ključ; during that time, the infantry entered their settlements and searched, looted and burned Muslim houses; part of the population returned to their settlements with a prior approval from the authorities, where searches, arrests and intimidation of the remaining population continued,

1.3. From 27 May 1992, the army and the police searched villages and settlements in Ključ, Sanica, Hripavci, Krasulje, Ramići, Prhovo, Velagići, Pudín Han, and other villages and settlements inhabited by the Muslim population, made intensive unlawful arrests and brought civilians to the detention facilities established in the primary school in Sanica, the primary school *Nikola Mačkić* in Ključ, the former railway station in Sanica, and the Public Security Station in Ključ, while inhabitants of certain settlements were called via the radio *Ključ* to gather at designated locations, such as the machine factory in Halinovsko Vrelo and the football stadium in Ključ, where the processing was done along with the physical and mental violence, including torture, beatings, and threats with weapons, and using such means of coercion, they interrogated civilians who were imprisoned and extorted statements about their alleged responsibility; after this processing, they released some of them, while at least 1161 men were transported under police escort to the camp on Manjača, where [REDACTED] died of blows he had already sustained immediately after the arrival there, while [REDACTED] died as a result of beatings in the camp on Manjača,

1.4. On 1 June 1992, after Serb soldiers entered the undefended village of Prhovo, dragging [REDACTED] tied to a personnel carrier, they expelled inhabitants from their houses and ordered them to gather in front of a shop in the village, on which occasion they killed at least seven persons, including [REDACTED]. All those who happened to be in the village acted in accordance with the order, they separated a number of men, took them on foot in the direction of the Peći village, and on the way there killed at least 15 persons, including [REDACTED] who were later exhumed from the mass grave *Ciganska dolina*, while those who survived were handed over to the police who beat them throughout the night, keeping them tied outdoors on the ground, as a result of which [REDACTED] died, while the others were transported to the premises of the *Nikola Mačkić* primary school in Ključ, where the police officers continued abusing them mentally and physically; a certain number of them were released, while the majority was transported to the *Manjača* camp,

- 1.5. On the same day, in the same village as mentioned under Count 1.4 – Prhovo, after soldiers forced all the inhabitants out of their houses, separated and took away twenty seven men, they drove the remaining men, women and children into the yard of [REDACTED]'s house and then fired at them and killed at least thirty civilians, mostly women and children, including [REDACTED]

[REDACTED] were later exhumed from a mass grave in Prhovo; the police continued persecuting and unlawfully depriving of liberty the men from the village even after the inhabitants who had survived left the village out of fear; those who were arrested were transported to the camp on Manjača after the interrogation on the premises of the *Nikola Mačkić* primary school or the Ključ Public Security Station,

- 1.6. On 1 June 1992, after all Muslim men from the hamlets of Vojići, Hasići, Nezići, Hadžići and other settlements of the village of Velagići were called to come to the police checkpoint in Velagići, military police officers took personal belongings from those who responded to the call and forced them into the premises of the old school, where they unlawfully imprisoned them, and then in the late evening hours they forced them out and executed them, on which occasion they killed at least 78 persons, including [REDACTED]

[REDACTED] who were later exhumed from the mass grave *Lanište II*; Vinko Kondić's police searched for those who survived, and after a month they pressured the surrender of person A in the way that they threatened to hurt his family; he was released after being interrogated and requested to confess if he was present at the execution site, and then he was unlawfully arrested again and transported to the *Manjača* camp,

- 1.7. On 26 June 1992, the army and the police launched a joint attack on the undefended Muslim villages Ramići, Krasulje, Hripavci and Ošiljak, on which occasion at least 21 civilians from these villages were killed, including [REDACTED]

[REDACTED] while the men who survived, at least 90 of them, were unlawfully deprived of liberty, interrogated in the detention facilities while being mentally and physically abused, and then, after being processed by Vinko Kondić's police, transported to Manjača,

- 1.8. On 10 July 1992, after soldiers entered the undefended villages and hamlets of the Ključ Municipality - Donji Biljani, Botonjići, Domazeti, Brkići and Jabukovica, with the police assistance, they brought all men whom they found there without any legal ground to the premises of the primary school in Donji Biljani, where the police registered the captives, and then they were taken out and killed; some men were loaded onto buses, taken in an unknown direction and killed, while some were hunted down and killed at various locations in the mentioned hamlets, on which occasion at least 219 persons were killed that day, including [REDACTED]

[REDACTED] who were later exhumed from the mass graves *Lanište I* and *Crvena zemlja* and identified,

- 1.9. From late May 1992 until April 1994 at least, the army and the police raided the undefended villages and hamlets Biljani, Domazeti, Botonjići, Donja and Gornja Sanica, Donji Budelj, Gornji Budelj, Šljivari, and Bašići, intimidated, beat and looted, killing at least 30 Muslim inhabitants of these villages and hamlets, including [REDACTED]

[REDACTED]
[REDACTED] who were later exhumed from graves found in the mentioned settlements and identified,

- 1.10. On 31 May 1992, in the hamlets and settlements of the village of Sanica, after members of the army and the police had forced men whom they found there out of their houses, they unlawfully deprived of liberty at least 200 of them and detained them in the premises of the primary school in Sanica, where they were interrogated and physically and mentally abused, and the following day the police transported them by buses to the *Nikola Mačkić* primary school in Ključ, where the police and the army continued with even more severe physical and mental torture along with other detainees found there, while the following day the transportation of the detainees to the premises of the primary school in Sitnica started under police escort, where they spent at least five days under police control, without food and normal life conditions, and then they were lined up four by four and taken to the *Manjača* camp on foot on a dirt road which was at least around 20 kilometers long,
- 1.11. From 27 May 1992, during and after a joint attack of the Serb army and police forces, settlements and villages inhabited by the Muslim and Croat population were systematically destroyed or damaged, including the Muslim part of the town of Ključ, Pudín Han, Velagići, Biljani, Plamenice, Prhovo, Krasulje, Crljeni and Sanica, as well as the property, including homes, business premises and outbuildings, while the movable property of those who were killed, imprisoned in detention facilities and camps, and displaced from the municipality was looted in an organized manner, and then collected in war booty warehouses in an organized manner, and it was handled following the instructions and under the control of the Municipal Crisis Staff, under the control of Vinko Kondić's police, while the population which was not deprived of liberty or imprisoned was displaced from the municipality area in an organized manner, until the municipality authorities considered that necessary,
- 1.12. From 28 May 1992, in the operations of the army and the police, with the task to mop up the villages on the route Pudín Han – Vukovo Selo – Hlumići – Plamenice – Prhovo – Peći, they expelled the Muslim population from their houses, conducted searches looking for weapons, sent part of

men fit for military service for interrogation, and intimidated them, on which occasion [REDACTED] was killed in Vukovo Selo, while [REDACTED] were killed on Ljutića brdo,

- 1.13. On 8 August 1992, after the Serb Army armed forces had entered the undefended hamlet Botonjići of the village of Biljani, they forced all the inhabitants who had survived 10 July 1992 out of their houses, then separated all the men, including two underage boys, and three women, and took them in the direction of the *Kamen* location; on the way they killed the old [REDACTED] and killed and burned the rest of them in [REDACTED] barn, while the women who survived were expelled to the village of Cralići,
- 1.14. From late May 1992, without any military need, activities were taken to demolish establishments designated for religious purposes, so that:
- on 29 May 1992, a mosque in Tičevići – Velagići was demolished,
 - on 31 May 1992, a mosque in Krasulje was demolished,
 - on 1/2 June 1992, a new mosque in Velagići was demolished,
 - on 10 July 1992, a mosque in Biljani was demolished,
 - in August 1992, the town mosque in Ključ was demolished,
 - in January 1993 the parish church of the Most Holy Virgin Mary in Ključ was burnt, and then demolished on 10 February

Therefore, they knowingly became members of a group of people organized to commit the criminal offense of Crimes against Humanity, and called on and instigated the perpetration of these offenses, and aware of the objectives set before the Crisis Staff of the Ključ Municipality, and thereby the objectives of the joint criminal enterprise, they participated in the preparation and organization, aiding and abetting in the planning and carrying out of a widespread and systematic attack directed against the civilian population, based on discrimination, which resulted in depriving another person of his/her life, extermination, deportation or forcible transfer of population, imprisonment or other severe deprivation of physical liberty in violation of fundamental rules of international law, torture, enforced disappearance of persons, and other inhumane acts of a similar character intentionally causing great suffering or serious injury to body or to physical or mental health,

Whereby, under Count 1 of the operative part of the Indictment, they committed the criminal offense of Organizing a Group of People and Instigating the Perpetration of Genocide, Crimes against Humanity and War Crimes referred to in Article 176(2) and (4) in conjunction with paragraph (1) of the same Article of the CC BiH, under Count 1, 1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, 1.8, 1.9, 1.10, 1.11, 1.12, 1.13 and 1.14 of the operative part of the Indictment, they committed the criminal offense of Crimes against Humanity referred to in Article 172(1)(h), in conjunction with subparagraphs (a), (b), (d), (f), (i) and (k) of the CC BiH, in conjunction with Article 176(2) in conjunction with paragraphs (1) and (4) of the same Article of the CC BiH, all in conjunction with Article 180(1) and (2) of the CC BiH and Article 29 of the CC BiH.

Therefore,

I P R O P O S E

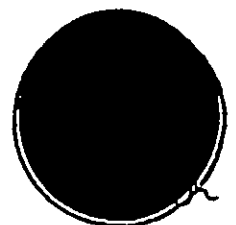
I. That, after the confirmation of the Indictment, the following persons be summoned to appear at the main trial before the Court of BiH, as the court having subject matter and territorial jurisdiction in this case:

- Prosecutor of the Prosecutor's Office of BiH
- Suspect Boško Lukić, who is currently in custody, and his defense counsel, Attorney Haris Bojić from Sarajevo
- Suspect Marko Adamović, who is currently in custody, and his defense counsel, Attorney Dragica Glušac from Banja Luka

II. That the following evidence be presented at the main trial:

a) Examination of the following witnesses:

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- 7.



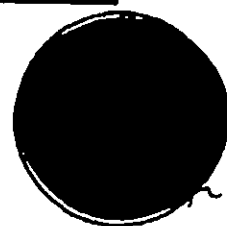
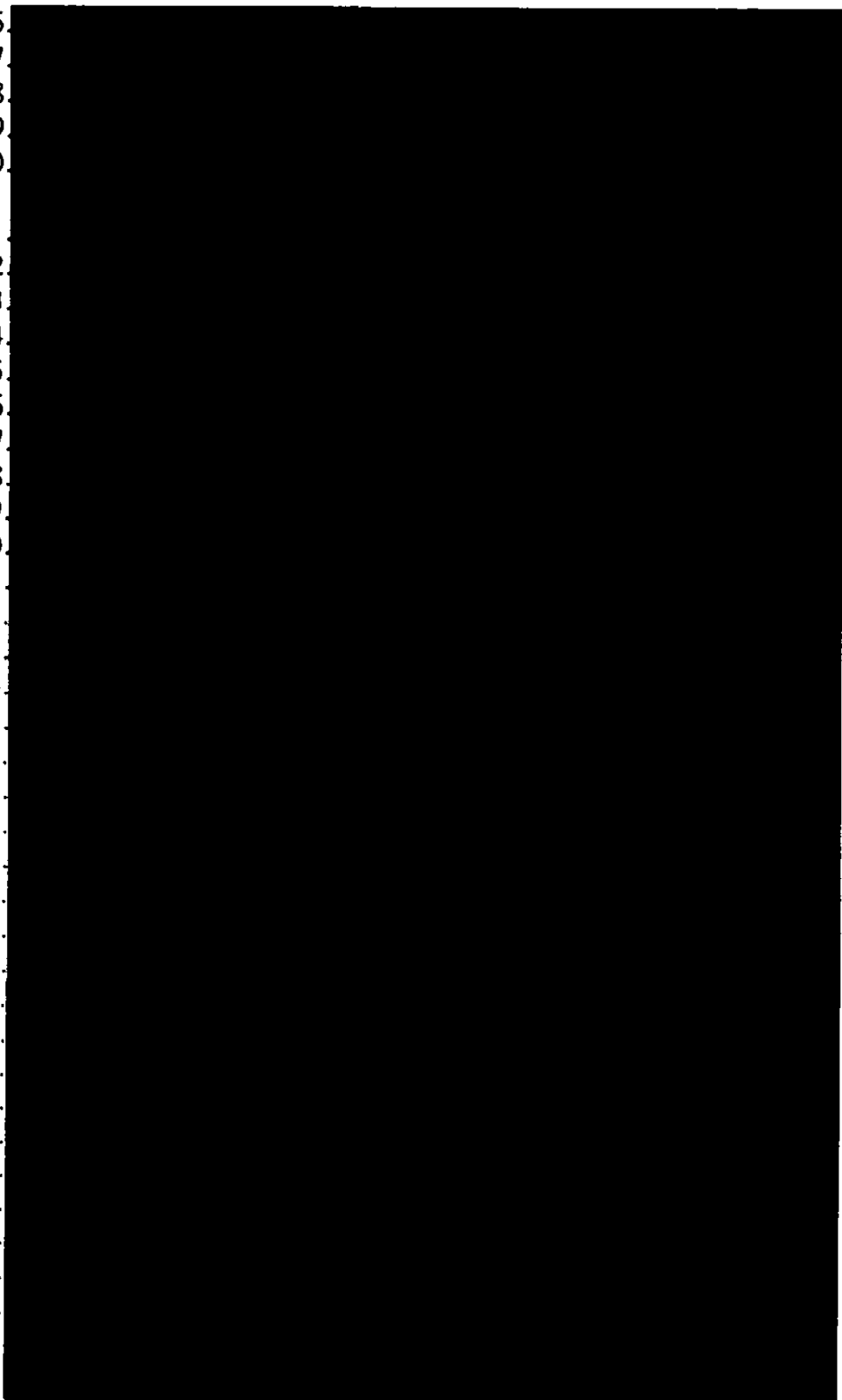
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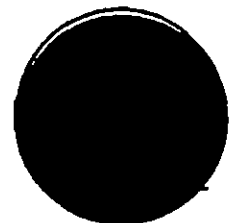
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b) Inspection of the following documentary evidence:

1. Personal file in the name of Boško Lukić
2. Certificate of information registered in the master register of PIO /Pension and Disability Insurance/ in the name of Boško Lukić
3. Personal file in the name of Marko Adamović
4. Certificate of information registered in the master register of PIO /Pension and Disability Insurance/ in the name of Marko Adamović
5. SDS membership application form in the name of Marko Adamović
6. Ključ SDS Crisis Staff (photographs)
7. List of members of the Ključ SDS Executive Committee
8. List of members of the Ključ SDS Executive Committee
9. List of SDS activists in local communities
10. Decision on the establishment of the War Presidency of the Ključ Municipal Assembly, number 05.01-98/92, dated 13 July 1992
11. Record of members of the SDS Municipal Board and their attendance at meetings starting from 1991
12. Photographs of some members of the Public Security Station and the Territorial Defense
13. Ključ, year of 1992 - video recording
14. Map of the town of Ključ
15. Map of the Ključ Municipality area
16. Topographic ordnance map of the Ključ Municipality
17. Topographic map of a part of BiH territory
18. Excerpt from the census according to the declaration of ethnic affiliation in inhabited places
19. Document of the Executive Committee of the SDS BiH, number 804-02/91, dated 22 October 1991
20. Sarajevo SDS order, dated 29 January 1991 – dispatch
21. Official announcement of the SDA /Party of Democratic Action/ Ključ, number 44/91, dated 31 October 1991
22. Instructions for the Organization and Activity of Organs of the Serb People in BiH in Extraordinary Circumstances, dated 19 December 1991 – SDS BiH
23. ARK /Autonomous Region of Krajina/ Assembly Banja Luka - conclusion dated 3 February 1992
24. Order of the Command of the 5th Corps, strictly confidential number 15-1, dated 7 January 1992

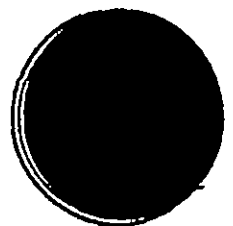
25. Ključ Municipal Assembly - Decision on the Municipality of Ključ joining the Autonomous Region *Bosanska Krajina*, dated 16 January 1992, number 05-023-3/92
26. Order of the Command of the 5th Corps, strictly confidential number 24-3, dated 18 February 1992
27. SDS BiH document number 01/1-2/92, dated 26 February 1992
28. Decision on the establishment of the Assembly of the Serb People in BiH, dated 24 October 1991 (Official Gazette of the Serb People in BiH, number 1/92)
29. Declaration of the Assembly of the Serb People in BiH, dated 24 October 1991, number 02-19/91 (Official Gazette of the Serb People in BiH, number 1/92)
30. Shorthand notes of the inaugural session of the Assembly of the Serb People in BiH, dated 24 October 1991
31. Decision on the territories in BiH which are considered the territory of the Federal State of Yugoslavia, number 36-02/91, dated 21 November 1991 (Official Gazette of the Serb People in BiH, number 1/92)
32. Decision on the verification of the proclaimed Serb Autonomous Districts in BiH, number 37-2/91, dated 21 November 1991 (Official Gazette of the Serb People in BiH, number 1/92)
33. Conclusions of the Assembly of the Serb People in BiH, dated 21 November 1991 (Official Gazette of the Serb People in BiH, number 1/92)
34. Decision on the establishment of Republika Srpska BiH, number 02-60/91, dated 21 December 1991
35. Decision on the Strategic objectives of the Serb people in BiH, number 02-130/92, dated 12 May 1992 (Official Gazette of Republika Srpska, number 22/93)
36. Decision on the promulgation of the Constitution of the Serb Republic of BiH, number 02-94/92, dated 28 February 1992 (Official Gazette of the Serb People in BiH, number 3/92)
37. Constitution of Republika Srpska (Official Gazette of RS, number 21/92)
38. Declaration on the government and political system of the state, number 02-803/92, dated 12 August 1992 (Official Gazette of RS, number 14/92)
39. Decision on the return of displaced persons to the territory of the Serb Republic of BiH, number 3-507, dated 2 June 1992 (Official Gazette of the Serb people in BiH, number 8/92)

40. Law on Defense (Official Gazette of the Serb people in BiH, number 7/92)
41. Conclusions of the ARK Crisis Staff, number 03-297/92, dated 8 May 1992
42. List of the ARK War Staff, number 03-288/92, dated 6 May 1992
43. Decision of the ARK Secretariat of National Defense, number 03-282/92, dated 4 May 1992 (ARK Official Gazette, number 2/92)
44. Decision on the establishment of the ARK Crisis Staff, number 03-285/92, dated 5 May 1992 (ARK Official Gazette, number 2/92)
45. Conclusions of the ARK Crisis Staff, number 03-297, dated 8 May 1992 (ARK Official Gazette, number 2/92)
46. Conclusions of the ARK Crisis Staff, number 03-299/92, dated 9 May 1992 (ARK Official Gazette, number 2/92)
47. Conclusions of the ARK Crisis Staff, number 03-308/92, dated 11 May 1992 (ARK Official Gazette, number 2/92)
48. Conclusions of the ARK Crisis Staff, number 03-319/92, dated 14 May 1992 (ARK Official Gazette, number 2/92)
49. Conclusions of the ARK Crisis Staff, number 03-328/92, dated 15 May 1992 (ARK Official Gazette, number 2/92)
50. Conclusions of the ARK Crisis Staff, number 03-329/92, dated 18 May 1992 (ARK Official Gazette, number 2/92)
51. Conclusions of the ARK Crisis Staff, number 03-338/92, dated 20 May 1992 (ARK Official Gazette, number 2/92)
52. Conclusions of the ARK Crisis Staff, number 03-364/92, dated 29 May 1992 (ARK Official Gazette, number 2/92)
53. Decision of the ARK Crisis Staff, number 03-392/92, dated 4 June 1992 (ARK Official Gazette, number 2/92)
54. Decision of the Presidency of SR BiH declaring the imminent threat of war, dated 8 April 1992 (Official Gazette of R BiH, number 1/92)
55. Decision of the Presidency of R BiH declaring the state of war, dated 20 June 1992 (Official Gazette of R BiH, number 7/92)
56. Shorthand transcript of the 14th session of the Assembly of the Serb People in BiH, dated 27 March 1992
57. Minutes of the 16th session of the Assembly of the Serb People in BiH, dated 12 May 1992
58. Report on the formation of the 13th Partisan Brigade, strictly confidential number 60, dated 23 March 1992
59. Document of the Command of the 5th Corps concerning the deployment of troops of the 30th Partisan Division, number 273-3, dated 3 April 1992



60. Minutes of the session of the National Security Council and the Government of the Serb R BiH, dated 27 April 1992
61. Excerpt from the Instructions of the Government of the Serb R BiH for the work of Crisis Staffs of the Serb people in municipalities, dated 26 April 1992
62. Document of the Command of the 30th Partisan Division, strictly confidential number 726-1, dated 19 April 1992
63. Press release of the Assembly of the Serb People in BiH, dated 4 April 1992
64. Minutes of the meeting of the Government of the Serb R BiH and the National Security Council, dated 22 April 1992
65. Document of the Autonomous Region of Bosanska Krajina number 01-1/92, dated 4 May 1992
66. Regular combat report, strictly confidential number 4-1/130, dated 7 May 1992
67. Document of the Command of the Banja Luka Corps, operational confidential number 420-1, dated 8 May 1992
68. Order of the Commander of the 6th Partisan Brigade
69. Document of the Command of the 1st Partisan Brigade, strictly confidential number 1-45/92, dated 14 May 1992
70. Order of the Command of the 30th Partisan Division, strictly confidential number 174-140, dated 16 May 1992
71. Minutes of the session of the Government of the Serb Republic of BiH, dated 23 May 1992
72. Instructions of the Government of the Serb Republic of BiH for the organization and work in municipalities in conditions of the imminent threat of war, number 03-412, dated 24 May 1992
73. Document concerning the organization and establishment of the 1st Krajina Corps of the Army of the Serb Republic, operational strictly confidential number 466-4, dated 27 May 1992
74. Command of the 1st Infantry Brigade, command post Šipovo, strictly confidential number I-121/92, dated 28 May 1992
75. Document of the Command of the 1st Krajina Corps, operational confidential number 44-1/152, dated 29 May 1992
76. Decision of the Presidency of the Serb R BiH on the establishment of war presidencies in municipalities, dated 31 May 1992
77. Document of the Command of the 1st Krajina Corps, operational confidential number 44-1/155, dated 31 May 1992
78. Document of the Command of the 30th Partisan Division, strictly confidential number 939-1, dated 31 May 1992

79. Document of the Command of the 1st Krajina Corps, operational confidential number 44-1/158, dated 2 June 1992
80. Document of the Command of the 1st Krajina Corps, operational confidential number 44-1/160, dated 3 June 1992
81. Criminal report of the Military Police, number KU 33/92, dated 5 June 1992
82. Complaint about unlawful deprivation of liberty, dated 12 June 1992
83. Statement of Boško Unčanin
84. Statement of Svetislav Račić
85. Statement of Ilija Krčmar
86. Official note dated 5 June 1992 VP /Military Post/ 4627- Mile Petrović
87. Official note dated 5 June 1992 VP 4627- Marinko Miljević
88. Official note dated 5 June 1992 VP 4627- Nikola Ćuk
89. Official note dated 5 June 1992 VP 4627- Zoran Banjac
90. Official note dated 3 June 1992 VP 4627
91. Conclusions from the meeting of the Sub-region, dated 7 June 1992
92. Decision of the ARK Crisis Staff to establish the Radio and Television Krajina, dated 4 June 1992 (Official Gazette 2/92)
93. Report of the 17th Light Infantry Brigade Ključ, strictly confidential number 01-25/92, dated 12 June 1992
94. Report of the 17th Light Infantry Brigade Ključ, strictly confidential number 01-31/92, dated 13 June 1992
95. Report of the 17th Light Infantry Brigade Ključ, strictly confidential number 01-12/92
96. Report of the 17th Light Infantry Brigade Ključ, strictly confidential number 01/5-92
97. Report of the 17th Light Infantry Brigade Ključ, strictly confidential number 01-31-5/92, dated 17 June 1992
98. Document of the Command of the 1st Corps, operational strictly confidential number 44- 1/180, dated 14 June 1992
99. Document of the Command of the 1st Corps, operational strictly confidential number 505-2, dated 14 June 1992
100. Document of the Command of the 1st Corps, operational strictly confidential number 482-1, dated 1 June 1992
101. Command of the 17th Light Infantry Brigade Ključ, strictly confidential number 01-31-8/92, dated 23 June 1992
102. Order of the 17th Light Infantry Brigade, strictly confidential number 01-93/92, dated 25 June 1992

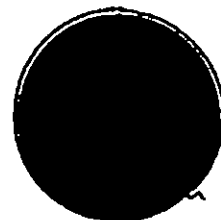


103. Document of the Command of the 1st Krajina Corps, strictly confidential number 44-1/201, dated 27 June 1992
104. Order for further operations, strictly confidential number 03-135, dated 9 July 1992
105. Report on the work of the Command of the 17th Light Infantry Brigade Ključ, dated 28 July 1992
106. Command of the 1st Krajina Corps – Selection of prisoners of war of the Prisoner of War Camp *Manjača*, number 21-50, dated 6 August 1992
107. Report of the commission on the visit to the collection centers and other facilities for prisoners in the ARK on 17 August 1992
108. Order of the Command of the 1st Krajina Corps, strictly confidential number 765-1/92, dated 15 December 1992
109. Decision of the National Assembly of Republika Srpska repealing the decision on the establishment of war commissions in municipalities during the imminent threat of war or the state of war, number 02-1978/92, dated 17 December 1992
110. Report to the Command of the 1st Krajina Corps, confidential number 01-326-22/93, dated 16 February 1993
111. Analysis of the Command of the 2nd Krajina Corps, year of 1992, strictly confidential number 3-39, dated 7 March 1993
112. Contribution to the monograph of the 1st Krajina Corps
113. Analysis of activities by elements of combat readiness in 1992 of the Command of the 1st Krajina Corps
114. Analysis of combat readiness and activities of the VRS /Army of Republika Srpska/ in 1992
115. Regular combat report of the Command of the 1st Krajina Corps, operational confidential number 44-1/151, dated 28 May 1992
116. Handwritten diary of Ljuban Bajić
117. First joint press release of the MBO /Muslim Bosniak Organization/ and the SDA /Party of Democratic Action/
118. Proposal of the Ključ SDS Executive Committee to the president of the Ključ National Defense Council, number 01/1-24/91, dated 15 October 1991
119. Minutes of the 7th session of the SDS Executive Committee, dated 25 February 1992
120. Minutes of the 8th session of the Ključ SDS Executive Committee, dated 6 March 1992
121. Minutes of the 9th session of the Ključ SDS Executive Committee, dated 12 March 1992

122. Minutes of the 10th session of the Ključ Executive Committee, dated 23 March 1992
123. Minutes of the 11th session of the Ključ SDS Executive Committee, dated 30 March 1992
124. Minutes of the 12th session of the Executive Committee of the Municipal Board of the SDS Ključ, dated 14 July 1992
125. Minutes of the 3rd session of the Ključ SDS Municipal Board, dated 2 September 1991
126. Minutes of the 5th session of the Ključ SDS Municipal Board, dated 22 January 1992
127. Minutes of the 6th session of the Ključ SDS Municipal Board, dated 18 February 1992
128. Minutes of the 8th session of the Ključ SDS Municipal Board, dated 29 April 1992
129. Minutes of the SDS Municipal Board session held on 10 December 1992
130. Excerpt from the minutes of the SDS Municipal Board session, dated 23 January 1993
131. Press release of the Ključ SDA /Party of Democratic Action/ Town Board, number 33/91, dated 21 September 1991
132. Proclamation of the SDA and MBO /Muslim Bosniak Organization/, number 32/91, dated 21 September 1991
133. Official announcement of the Ključ MBO Municipal Board, number 34/91, dated 21 September 1991
134. Document of the MBO Municipal Board, number 35/91, dated 23 September 1995
135. Information for the public about the sessions of the Executive Committee and the Municipal Assembly Ključ
136. Proposal of the Crisis Staff of the Ključ Municipal Assembly regarding the organizational scheme for work of municipal bodies in war conditions, May 1992
137. Handwritten list of members of the Ključ Territorial Defense made at the meeting held on 3 April 1992
138. Order of the President of the National Defense Council of the Ključ Municipal Assembly, number 05-01-45/92, dated 5 May 1992
139. Press release of the Ključ Municipality Crisis Staff
140. Book of minutes of the sessions of the Crisis Staff of the Ključ Municipal Assembly
141. Press release of the Crisis Staff and the Defense Command of the Ključ Municipality, number 6/92, dated 2 June 1992

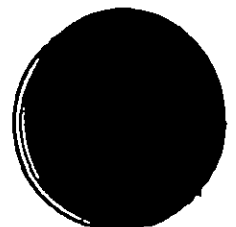
142. Minutes of the session of the Crisis Staff of the Ključ Municipal Assembly, 13-14 May 1992
143. Order of the Crisis Staff of the Ključ Municipal Assembly, strictly confidential number 02/92, dated 15 May 1992
144. Order of the Crisis Staff, number 22/92, dated 25 May 1992
145. Order of the Ključ Municipality Crisis Staff, strictly confidential number 01/92, dated 27 May 1992
146. Order of the Ključ Municipality Crisis Staff, dated 28 May 1992
147. Order of the Ključ Municipality Defense Command, dated 29 May 1992
148. Conclusion of the Ključ Municipality Crisis Staff, number 66/92, dated 18 June 1992
149. Information dated 3 June 1992
150. Warning and information given by the Ključ Defense Command through the media
151. Announcement to citizens of the Ključ Municipality
152. Public announcement regarding the contents of the dispatch of the Banja Luka Security Services Centre
153. Order of the Crisis Staff of the Ključ Municipal Assembly, number 19/92, dated 4 June 1992
154. Announcement of the Crisis Staff of the Ključ Municipal Assembly, number 20/92, dated 4 June 1992
155. Announcement of the Decision on displacement of the War Presidency of the Ključ Municipality
156. Information of the Crisis Staff, dated 8 June 1992
157. Information of the Crisis Staff, dated 9 June 1992
158. Brigade Command – warning of 15 June 1992
159. Public Security Station press release and the report of the 13th session of the Ključ Municipal Assembly
160. Press release from the session of the SDA and MBO caucus, dated 30 January 1992
161. Conclusion of the Crisis Staff of the Ključ Municipal Assembly, number 64/92, dated 17 June 1992
162. Press release "Mopping up the terrain"
163. Document entitled "Announcement for 27 June 1992"
164. Press release entitled "convoys", "migrations, displacement"
165. Address of the Banja Luka Bishop's Ordinariate, number 577/92, dated 13 August 1992

166. Delivery of information of the Ključ Municipal Assembly concerning the managerial personnel, number 02-483/92, dated 21 June 1992
167. Delivery of information concerning the managerial personnel of the Ključ Municipal Assembly, number 01-737/92, dated 23 June 1992
168. Ključ Municipal Assembly – Overview of managerial positions held by Muslim employees, dated 26 June 1992
169. Excerpt from the minutes of the session of the War Presidency of the Ključ Municipal Assembly, dated 10 July 1992
170. Press release "command - regular report - 7 July 1992"
171. Decision of the War Presidency of the Ključ Municipal Assembly, number 05-01-93/92, dated 13 July 1992
172. Decision of the War Presidency of the Ključ Municipal Assembly on the appointment of the commission for the reception of war booty obtained in another manner, number 05-01-96/92, dated 13 July 1992
173. Conclusion made at the session of the War Presidency of the Ključ Municipal Assembly, dated 13 July 1992
174. Conclusion of the War Presidency of the Ključ Municipal Assembly, number 05-01-100/92, dated 15 July 1992
175. Decision of the War Presidency of the Ključ Municipal Assembly, number 05.01_/92, dated 21 July 1992
176. Decision on the dismissal of the President of the Executive Committee of the Ključ Municipality, dated 21 July 1992
177. Decision on the dismissal of a judge of the Basic Court in Ključ, number 05.03-7/92, dated 2 July 1992
178. Decision on the dismissal of a judge of the Municipal Magistrate's Court in Ključ
179. Decision on the appointment of the acting President of the Basic Court in Ključ, number 05-03-5/92, dated 1 July 1992
180. Decision of the War Presidency of the Ključ Municipal Assembly, number 05.01-118/92, dated 21 July 1992
181. Excerpt from the minutes of the session of the War Presidency, dated 22 July 1992
182. Press release from the session of the War Presidency, dated 22 July 1992
183. Excerpt from the Minutes of the 4th session of the War Presidency of the Ključ Municipal Assembly, dated 28 July 1992



184. Decision of the War Presidency of the Ključ Municipal Assembly on the criteria for the possibility of moving out of the area of the Ključ Municipality, dated 30 July 1992
185. Minutes of the 13th session of the Ključ Municipal Assembly, dated 31 July 1992
186. Record made by the commission for the collection of information for the displacement of population from the area of the Ključ Municipality, number 05-01-135-14/92, dated 31 July 1992
187. Report on the work of the Crisis Staff of the War Presidency of the Ključ Municipal Assembly in the period from 15 May 1992
188. Report on the work of the Executive Committee of the Ključ Municipal Assembly in the period from 31 May 1992
189. Record made by the commission for the collection of information for the displacement of population from the area of the Ključ Municipality, number 05-01-135-59/92, dated 3 August 1992
190. Record made by the commission for the collection of information for the displacement of population from the area of the Ključ Municipality, number 05-01-135-40/92, dated 3 August 1992
191. Record made by the commission for the collection of information for the displacement of population from the area of the Ključ Municipality, number 05-01-135-130/92, dated 4 August 1992
192. Record made by the commission for the collection of information for the displacement of population from the area of the Ključ Municipality, number 05-01-135-183, dated August 1992
193. Record made by the commission for the collection of information for the displacement of population from the area of the Ključ Municipality, number 05-01-135-298/92, dated 7 August 1992
194. Record made by the commission for the collection of information concerning the displacement of population from the area of the Ključ Municipality, number 05-01-135-367/92, dated 10 August 1992
195. Record made by the commission for the collection of information concerning the displacement of population from the area of the Ključ Municipality, number 05-01-135-470/92, dated 10 August 1992
196. Record made by the commission for the collection of information concerning the displacement of population from the area of the Ključ Municipality, number 05-01-135-753/92, dated 17 August 1992

197. Record made by the commission for the collection of information concerning the displacement of population from the area of the Ključ Municipality, number 05-01-155-787/92, dated 19 August 1992
198. Record made by the commission for the collection of information concerning the displacement of population from the area of the Ključ Municipality, number 05-01-139763/92, dated 17 August 1992
199. Record made by the commission for the collection of information concerning the displacement of population from the area of the Ključ Municipality, number 05-01-135-784/92, dated 18 August 1992
200. Excerpt from the minutes of the 6th session of the War Presidency of the Ključ Municipal Assembly, dated 7 August 1992
201. Order of the War Presidency of the Ključ Municipal Assembly, dated 7 August 1992
202. Overview of decisions, conclusions and orders issued by the Crisis Staff – War Presidency
203. Decision on the establishment of the disciplinary commission, number 103/92
204. Decision of the Basic Court in Ključ, number SU: 110/92, dated 18 August 1992
205. Decision of the Basic Court in Ključ, number SU: 109/92, dated 18 August 1992
206. Decision of the Basic Court in Ključ, number SU: 108/92, dated 18 August 1992
207. Request of the Basic Court in Ključ to initiate a proceeding of disciplinary accountability of the employee Smajil Džaferagić and others, number 104/92, dated 17 August 1992
208. Forest Industry Company *Ključ*, enquiry to the War Presidency, number 01-934/92, dated 4 September 1992
209. Decision of the War Presidency of the Ključ Municipal Assembly, number 05-01-194/92, dated 7 September 1992
210. Record made by the commission for the collection of information concerning the displacement of population from the area of the Ključ Municipality, number 05-01-135-1350/92, dated 8 September 1992
211. Press release "Explosion of insanity", "Report – Public Security Station", "Ključ Municipal Assembly" reports
212. Press release "Public Security Station"

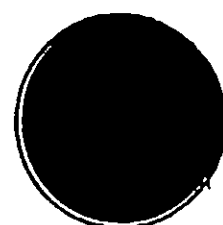


213. Minutes of the 14th session of the Ključ Municipal Assembly held on 29 December 1992
214. Letter to the President of the Ključ Municipal Assembly, dated February 1993
215. Minutes of the Staff session, dated 5 October 1991
216. Order of the Ključ Crisis Staff, dated 30 May 1992
217. Decision of the Executive Committee of the Ključ Municipal Assembly, number 05-023-103/93, dated 22 March 1993
218. Press release "People from Kupres are going to the front", "Mopping up the terrain"
219. Conclusions of the Banja Luka Security Services Centre, number: S.p. 11-128, dated 25 July 1991
220. Conclusions from the expanded session of the center council held on 6 May 1992, dispatch number 11-144, dated 20 May 1992
221. Banja Luka Security Services Center dispatch, number 11-1/01-6, dated 1 July 1992, and number 03-531/92, dated 22 June 1992
222. Banja Luka Security Services Center dispatch, number 11-170, dated 20 July 1992
223. Banja Luka Security Services Center dispatch, number 11-1/02-1-301, dated 31 July 1992
224. Banja Luka Security Services Center dispatch, number 11-1/01-OD-439, dated 19 August 1992
225. Minutes of the meeting held in Banja Luka on 11 February 1992
226. Report on the work of the RS Ministry of the Interior for the period July-September 1992
227. Report on the work of the RS Ministry of the Interior for the period April-December 1992
228. List of names of persons who were released and pardoned, number 347/400, dated 7 October 1992
229. Report on the analysis of work and activities of the Public Security Station in 1992
230. Overview of citizens who moved out of and citizens who moved in the areas covered by the Banja Luka Security Services Center sector
231. Security Services Center dispatch, number 11-1/01-48, dated 28 May 1992
232. Banja Luka Security Services Center dispatch, number 11-1/01-54, dated 12 June 1992
233. Ključ Public Security Station wartime organization strength, number 88/91, dated 7 October 1991

234. Report to the Chief, dated 24 October 1992
235. Document of the Ključ Public Security Station sent to the Municipal Secretariat of National Defense, number 11-8/08-83-16/92, dated 19 March 1992
236. List of prisoners in the Stara Gradiška camp
237. List of prisoners in the Stara Gradiška camp by categories
238. Overview of the number of persons in the prisoner of war camp *Stara Gradiška* by categories of persons, year of 1992
239. List of prisoners of war in the Manjača camp, dated 15 June 1992
240. List of prisoners of war from Ključ (planned for the release and other prisoners of war)
241. List of police employees and other authorized persons who signed the oath
242. List of reserve police employees engaged in the Ključ Public Security Station for July 1992
243. List of authorized employees of the Ključ Public Security Station who received official badges
244. List of reservists who signed the oath
245. CD – scanned documentation of the Ključ Police Station – daily events log book from 30 July 1991 to 19 March 1992, reports written by patrolmen from 23 September 1991 to 31 December 1991, handover of duty from 28 February 1992 to 31 July 1992, handover of duty from 1 August 1992 to 7 October 1992, handover of duty from 7 October 1992 to 18 December 1992, roster October 1993 – December 1994, record of persons brought in the Sanica Branch Police Station – 1992
246. Ključ Public Security Station – Overview of police employees and operations officers in reserve forces in June, dated 14 July 1992
247. Engagement of members of reserve police forces in July 1992, number 11-8/08-80-96/92, dated 4 August 1992
248. List of persons who were issued with a weapon
249. List of detained persons from the place Ključ
250. Ključ Public Security Station – List of persons detained on 29 May 1992
251. Ključ Public Security Station – List of persons brought in the Wartime Police Station Sanica for further processing on 14 June 1992
252. Ključ Public Security Station – List of enemy formation soldiers who were apprehended in the area of Sanica, dated 16 June 1992

253. List of persons who were apprehended during the mopping up of the terrain of the Ključ Municipality, number S1/92, dated 27 June 1992
254. Ključ Public Security Station official note, dated 10 July 1992
255. Ključ Public Security Station – List of persons sent to the *Manjača* camp, dated 22 July 1992
256. Information on the work and activities of the Ključ Public Security Station during combat operations in the area of the Ključ Municipality, number 9/92, July 1992
257. Ključ Public Security Station information for the Banja Luka Security Services Center, number 437/92, dated 5 August 1992
258. Ključ Public Security Station – List of prisoners from the territory of the Ključ Municipality in the prisoner of war camp *Manjača*, number 11-8/01-01-S1/92, dated 29 August 1992
259. Ključ Public Security Station dispatch, number 770/92, dated 25 September 1992
260. Information on committed criminal offenses in the area of the municipality since the outbreak of the armed uprising on 27 May 1992, number 17/92, dated 28 September 1992
261. Official note of the sector of the National Security of the war department Ključ, dated 29 September 1992
262. Banja Luka Security Services Center dispatch, number 11-1/02-1-441, dated 17 November 1992
263. Ključ Public Security Station Information regarding serious criminal offenses committed by unknown perpetrators for the Banja Luka Security Services Center, number 13/92, dated 23 November 1992, and the Banja Luka Security Services Center dispatch, number 11-1/02-2-441, dated 17 November 1992
264. Ključ Public Security Station dispatch, number 860/92, dated 24 November 1992
265. Ključ Public Security Station dispatch, number 859/92, dated 24 November 1992
266. Document of the Public Prosecutor's Office Ključ, KTA-3/93, dated 1 February 1993
267. *Manjača*, 20 August 1992 – meeting
268. Ključ Public Security Station dispatch, number 137/94, dated 16 February 1994
269. Ključ Public Security Station – List of persons from Ključ planned for transfer, number 11-12/01-01-7/94, dated 4 February 1994

270. Ključ Public Security Station dispatch, number 31/94, dated 11 March 1994
271. Work plan for the seizure of passenger vehicles kept by Serb citizens which they were obliged to hand over to the Municipal commission for confiscated goods, dated 17 March 1994
272. Official note, dated 30 July 1992
273. Certificate of the handover of the item, number SI/92, dated 17 August 1992
274. Document of the Executive Committee of the Ključ Municipal Assembly, number 05-1-187/92, dated 27 August 1992
275. Information on the culturocide of religious facilities of the cultural and historic heritage of Bosniaks of the Ključ Municipality
276. Photo-documentation of demolished religious facilities
277. Document of the Command of the VP /Military Post/ 70383 Ključ, number 12/515-1, dated 18 November 1992
278. Document of the Command of the 30th Partisan Division, number 174-238, dated 9 June 1992
279. The Bosnian Serb Leadership, 1990 to 1992. Addendum. Governing Structures in the Autonomous Region of Krajina, 1991, 1992, research report by [REDACTED]
280. Bosnian Serb Crisis Staffs, research report by [REDACTED]
281. Military situation in Bosanska Krajina in 1992, situation analysis, military analyst [REDACTED]
282. ICTY Judgment in the Krajišnik case, number IT-00-39
283. ICTY Judgment in the Brđanin case, number IT-99-36
284. ICTY Judgment in the Kordić and Čerkez case, number IT 95-14/2
285. Photo-documentation, number 628/08, dated 10 January 2008
286. Document of the District Territorial Defense Staff Banja Luka, number pov-08/114-3, dated 18 February 1991
287. Document of the District Territorial Defense Staff Banja Luka, number 06/322-1, dated 26 August 1991
288. Minutes of the session of the War Presidency of the Ključ Municipal Assembly, dated 5 November 1994
289. Information about the situation in the Ključ Municipality area regarding civilian affairs, dated 19 May 1993, made by the VP 7286, number 15/93
290. Document of the Ključ Municipal Assembly in a folder, confidential number 12/246, dated 26 December 1991
291. Certificate in the name of Boško Lukić, number 08/1149-1-1



292. List of the handover of weapons, received from the SDS
293. Crisis Staff Decisions number 05-01-80/92, dated 6 July 1992
294. Document of the Command of the 17th Light Infantry Brigade, confidential number 01-994, dated 30 July 1995
295. Decision on the establishment of the War Presidency of the Ključ Municipality, number 01-1532/95
296. Dispatch number 85/91, dated 24 September 1991
297. Document Crisis Staff of the Ključ Municipality
298. Minutes of the meeting of the headquarters protection company of the Municipal Staff of the Territorial Defense Ključ, dated 25 October 1991
299. Document number 50/91, dated 24 December 1991
300. Announcement of the MBO /Muslim Bosniak Organization/ Municipal Board, dated 17 September 1991
301. Information from the Ključ SDS Municipal Board for the SDS BiH
302. Document of the Ključ Municipal Assembly sent to the ARK Assembly, number 05/1-6/92, dated 27 March 1992
303. Certificate of the Ključ SDS Municipal Board, number 01/1-32/91, dated 27 December 1991
304. Document of the Executive Committee of the Municipal Board of the SDS Ključ, number 01/1-21 91, dated 24 September 1991
305. Document of the Command of the 17th Light Infantry Brigade Ključ, confidential number 04/603, dated 11 July 1993
306. Document of the Personnel Commission of the SDS Ključ, number 01/1-14/94
307. Conclusions of the SDS local board Ratkovo, dated 8 March 1992
308. Document of the SDS Ključ, number 01/1-4/92, dated 20 March 1992
309. Record number 05.01-135-833/92, dated 24 August 1992
310. Record number 05.01-135-148/92, dated 4 August 1992
311. Record number 05.01-135-287/92, dated 7 August 1992
312. Record number 05.01-135-432/92, dated 10 August 1992
313. Record number 05.01-135-557/92, dated 11 August 1992
314. Record number 05.01-135-460/92, dated 10 August 1992
315. Record number 05.01-135-753/92, dated 17 August 1992
316. Record number 05.01-135-40/92, dated 3 August 1992
317. List of "persons from Humići who should be apprehended"
318. List of persons captured in 1992 in Crljeni, Ključ Municipality

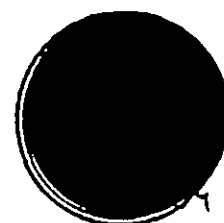
319. List of persons from enemy formations who were captured on 1 June 1992
320. List of captives from the enemy formations who were brought on 26 June 1992
321. List of captives in the gym – handwritten
322. Order of the Ključ Defense Command and the Ključ Municipality Crisis Staff, dated 30 May 1992
323. List of persons to be processed, dated 11 June 1992
324. List of persons who are sent to the prisoner of war camp *Manjača*, dated 20 July 1992
325. Report on activities of Muslim extremists *Green Berets* in the zone of war operations in the area of the villages Kamičak and Ramići of the Ključ Municipality, dated 22 August 1992
326. List of persons from the area of Ramići and Krasulje and the surrounding places who were interrogated on 31 May 1992
327. List of persons from the enemy formations captured in the area of Pudin Han – Velagići
328. List of persons from Rejzovići detained on 12 June 1992
329. List of persons from the enemy formations captured in the zone of combat operations, number SI./92, dated 23 June 1992
330. List of persons from the enemy formations captured on 9 June 1992 in the village of Ramići, Ključ Municipality
331. List of persons released from the prisoner of war camp in accordance with the order issued by the Corps Commander
332. Lists of persons for whose release consent is given on the basis of the proposal of the Commission of the prisoner of war camp *Manjača*, dated 22 August 1992
333. Request of the Command of the 13th Partisan Brigade, dated 18 March 1992
334. Document number 02/1-80-119, dated 24 May 1993
335. Document of the Public Enterprise *Radio-Ključ*, number 19/92, dated 13 July 1992
336. Document of the Public Enterprise *Radio-Ključ*, number 01-01/93, dated 5 February 1993
337. Document of the Public Enterprise *Radio-Ključ*, number 29/92, dated 12 August 1992
338. Response to the letter of the President of the Municipal Assembly to the Radio by the Vice-President of the Ključ Municipal Assembly
339. Press release number 33/91, dated 21 September 1991

340. Official announcement of the President of the Ključ Municipal Assembly
341. V. Kapetanović "The fiftieth anniversary of crimes against the Serb people", dated 10 September 1991
342. SDS document, number 01-14/91, dated 10 August 1991
343. SDS document, number 41/91, dated 8 October 1991
344. Decision on the general mobilization of the Ključ Municipality Crisis Staff
345. Official announcement, number 8/91, dated 1 August 1991
346. Decisions rejecting the Municipality of Ključ joining the ARK, dated 14 January 1992, 13 January 1992, 15 January 1992
347. Order of the Ključ Municipality Crisis Staff, number 02/1-80-79, dated 30 May 1992
348. Document of the Ključ Defense Staff
349. Certificate dated 28 September 1992
350. Ključ Municipality Crisis Staff – press release
351. Orders of the Command of the Territorial Defense of the Ključ Municipality, number 05/25-1, dated 6 March 1992 – with the covering document
352. Document of the President of the Ključ Municipal Assembly
353. Record number 68/92, dated 26 June 1992
354. List of automatic weapons – handwritten
355. Document of the Command of the 1st Krajina Corps, confidential number 12/1-276/1, dated 27 May 1992
356. Document of the Command of the 30th Partisan Division entitled *Krajina 92*, dated 28 April 1992
357. SDS Ključ document, number 01/1-28 91, dated 6 November 1991
358. Document of the Command of the 17th Light Infantry Brigade, dated 15 May 1995
359. Document of the Command of the 17th Light Infantry Brigade, dated 15 June 1995
360. Document of the Command of the 17th Light Infantry Brigade, dated 7 July 1995
361. Document of the Command of the 17th Light Infantry Brigade, dated 6 July 1995
362. Document of the Command of the 17th Light Infantry Brigade, dated 1 July 1995
363. Document of the Command of the 17th Light Infantry Brigade, confidential number 01-758, dated 23 June 1995

364. Order of the Command of the 17th Light Infantry Brigade, dated 17 June 1995
365. Order of the Command of the 2nd Krajina Corps, strictly confidential number 3-241, dated 6 August 1995
366. List of persons from the inhabited place who were not processed 5 pages
367. Order of the Crisis Staff, number 11-23/92
368. Order of the Crisis Staff, number 24/92
369. Order of the Crisis Staff, number 18/92
370. Order of the Crisis Staff, number 05-01-55/92
371. Decision of the Crisis Staff, number 05-01-7/92
372. "Warning" – Ključ Defense Command and the Ključ Municipality Crisis Staff
373. Announcement of the Ključ Defense Command, dated 28 May 1992
374. Announcement of the MBO /Muslim Bosniak Organization/, dated 17 September 1991
375. "Crisis Staff" 13 June 1992
376. Decisions of the Ključ Municipal Assembly of 31 July 1992, published in the Official Gazette of the Ključ Municipality number 3/92
377. Document of the Crisis Staff of the Territorial Defense Sarajevo, confidential 08/76-30, dated 26 February 1992
378. Decision of the President of the Municipal Assembly, Jovo Banjac
379. Order number 495-1, dated 4 June 1992
380. Minutes of the 24th session of the Ključ Municipal Assembly
381. Document number Str.pov./strictly confidential/ 01-31-6/92, dated 18 June 1992
382. Excerpt from the record of events – handwritten
383. Law on All-People's Defense (Official Gazette of SR BiH, number 3/84)
384. Decision of the Basic Court in Ključ, number KRI.56/96, dated 10 November 1996
385. Record on the autopsy from the Basic Court in Ključ, number KRI.56/96, dated 11 November 1996
386. Photo-documentation *Velagići II*, Hadžići - Ravnice, dated 10 November 1996
387. Sketch of the scene *Velagići II* Hadžići - Ravnice, dated 10 November 2006

388. Record on the on-site investigation and exhumation from the Ključ Municipal Court, number KRI-58/99, dated 24 September 1999
389. Record on the autopsy of corpses from the Ključ Municipal Court, number KRI-58/99, dated 25 September 1999
390. Sketch of the scene and photo-documentation of the mass grave *Ciganska dolina*
391. Record on the on-site investigation from the Ključ Municipal Court, number KRI-10/2000, dated 15 March 2000
392. Prhovo overview with a map of Ključ and photo-documentation
393. Record on the exhumation and on-site investigation from the Cantonal Court in Bihać, number Kri:32/97, dated 7 May 1997
394. Record on the identification and autopsy of corpses from the Cantonal Court in Bihać, number Kri.32/97, dated 13 May 1997
395. Sketch of the scene, *Prhovo*, Ključ Municipality, number 41/97, dated year */as printed/*
396. Photo-documentation, *Prhovo*, Ključ, dated 7 May 1997
397. Decision on the exhumation by the Basic Court in Ključ, number KRI.58/96, dated 4 October 1996
398. Record on the on-site investigation and exhumation, number KRI.58/96, dated 5 October 1996
399. Record on the autopsy, number KRI-58/96, dated 8 October 1996
400. Sketch of the scene of exhumation of the mass grave *Lanište II*, dated 6 October 1996
401. Photo-documentation of the exhumation of the mass grave *Lanište II*, part I and II
402. Photo-documentation of Velagići made on 21 July 2001
403. Decision of the Basic Court in Ključ, number KRI.55/96, dated 9 November 1996
404. Record on the autopsy of the Basic Court in Ključ, number KRI.55/96, dated 10 November 1996
405. Sketch of the scene, gravesite *Krasulje I*, dated 9 November 1996
406. Photo-documentation, gravesite *Krasulje I*, dated 9 November 1996
407. Sketch of the scene, gravesite *Krasulje II*, dated 9 November 1996
408. Photo-documentation, gravesite *Krasulje II*, dated 9 November 1996
409. Sketch of the scene, gravesite *Krasulje III*, dated 9 November 1996

410. Photo-documentation, gravesite *Krasulje III*, dated 9 November 1996
411. Sketch of the scene, gravesite *IV*, dated 9 November 1996
412. Photo-documentation, gravesite *IV*, dated 9 November 1996
413. Sketch of the scene, mass grave *Krasulje V*, Ključ Municipality, dated 9 November 1996
414. Photo-documentation, gravesite mass grave *Krasulje V*, dated 9 November 1996
415. Sketch of the scene, gravesite *Krasulje VI*, dated 9 November 1996
416. Photo-documentation, gravesite *Krasulje VI*, dated 9 November 1996
417. Sketch of the scene, gravesite *Krasulje VII*, dated 9 November 1996
418. Photo-documentation, gravesite *Krasulje VII*, dated 9 November 1996
419. Sketch of the scene, gravesite *Krasulje VIII*, dated 13 November 1996
420. Photo-documentation, *Krasulje VIII*, dated 13 November 1996
421. CD – *Lanište, Crvena zemlja and Biljani*, scanned documentation relating to decisions on exhumations, records on on-site investigation and exhumation, records on the autopsy of corpses and photo-documentation of the mentioned mass graves
422. Biljani map with photo-documentation
423. Decision of the Basic Court in Ključ, number Kri.52/96, dated 4 November 1996
424. Record on the on-site investigation and exhumation from the Basic Court in Ključ, number KRI-53/96, dated 5 November 1996
425. Record on the autopsy, number KRI-52/96, dated 6 November 1996
426. Record on the uncovering of the mass grave Ramići I - Ključ, number Kri. 41/95, dated 9 November 1995
427. *List of captured persons in the primary school Biljani*, 10 July 1992 – handwritten
428. *List Biljani school*, 10 July 1992 – handwritten
429. Decision of the Basic Court in Bihać, number KRI-48/96, dated 14 October 1996
430. Record on the on-site investigation and exhumation from the Basic Court in Ključ, number KRI.48/96, dated 14 October 1996



431. Record on the on-site investigation and exhumation from the Basic Court in Bihać, number KRI 48/96, dated 6 November 1996
432. Record on the autopsy from the Basic Court in Ključ, number KRI-48/96, dated 7 November 1996
433. Record on the autopsy from the Basic Court in Ključ, number KRI-48/96, dated 14 October 1996
434. Decision of the Basic Court in Ključ, number KRI.53/96, dated 7 November 1996
435. Record on the autopsy from the Basic Court in Ključ, number KRI-53-96, dated 8 November 1996
436. Decision of the Basic Court in Ključ, number KRI.54/96, dated 8 November 1996
437. Record on the autopsy from the Basic Court in Ključ, number KRI-54-96, dated 9 November 1996
438. Sketch of the scene, gravesite *Sanica I*, Donji Budelj hamlet, Ključ Municipality, dated 7 November 1996
439. Photo-documentation, gravesite *Sanica I*, Donji Budelj hamlet, Ključ Municipality, dated 7 November 1996
440. Sketch of the scene, gravesite *Sanica II*, Donji Budelj hamlet, Ključ Municipality, dated 7 November 1996
441. Photo-documentation, gravesite *Sanica II*, Donji Budelj hamlet, Ključ Municipality, dated 7 November 1996
442. Sketch of the scene, gravesite *Sanica IV*, Mahala, Ključ Municipality, dated 7 November 2006
443. Photo-documentation, gravesite *Sanica IV*, Mahala, Ključ Municipality, dated 7 November 1996
444. Sketch of the scene, gravesite *Sanica V*, Mahala hamlet, Ključ Municipality, dated 7 November 1996
445. Photo-documentation, gravesite *Sanica V*, Mahala hamlet, Ključ Municipality, dated 7 November 1996
446. Sketch of the scene, gravesite *Donja Sanica V*, place Jezero, Ključ Municipality, dated 8 November 1996
447. Photo-documentation, gravesite *Donja Sanica V*, Jezero, Ključ, dated 8 November 1996
448. Sketch of the scene, gravesite *Sanica – VI*, hamlet Žežnica – Gornji Budelj, Ključ Municipality, dated 8 November 1996
449. Photo-documentation, gravesite *Sanica IV*, hamlet Žežnica – Gornji Budelj, Ključ Municipality, dated 7 November 1996
450. Death certificate for [REDACTED]
451. Death certificate for [REDACTED]

452. Death certificate for [REDACTED]
453. Documents number 11-12/09-202-1/94, dated 10 and 11 March 1994
454. Request of [REDACTED] dated 18 January 1994
455. Decision number 11-1/09-202-10, dated 2 February 1994
456. Certificate of death for [REDACTED] dated 18 January 1994
457. Record on the on-site investigation of the Cantonal Court in Bihać, number Kri.31/97, dated 9 May 1997
458. Decision of the Cantonal Court in Bihać, number Kri.30,31, 32/97, dated 7 May 1997
459. Photo-documentation, Botonjići *Kamen*, Ključ Municipality, dated 9 May 1997
460. Sketch of the scene, Botonjići *Kamen*, Ključ Municipality, dated 9 May 1997
461. Death certificate for [REDACTED] number 02-13-3-1658/08, dated 25 February 2008
462. Death certificate for [REDACTED] number 05-13-3-95/08, dated 25 February 2008
463. Death certificate for [REDACTED] number 02/1-13-3-396/08, dated 21 December 2008
464. Death certificate for [REDACTED] number 02/1-13-3-393/08, dated 21 February 2008
465. Death certificate for [REDACTED] number 02/1-13-3-392/08, dated 21 February 2008
466. Death certificate for [REDACTED] number 02/1-13-3-398/08, dated 21 February 2008
467. Death certificate for [REDACTED] number 02/1-13-3-394/08, dated 21 February 2008
468. Death certificate for [REDACTED] number 02/1-13-3-400/08, dated 21 February 2008
469. Death certificate for [REDACTED] number 02/1-13-3-399/08, dated 21 February 2008
470. Death certificate for [REDACTED] number 02/1-13-3-397/08, dated 21 February 2008
471. Death certificate for [REDACTED] number 02/1-13-3-395/08, dated 21 February 2008
472. Death certificate for [REDACTED] number 02/1-13-3-370/08, dated 21 February 2008
473. Death certificate for [REDACTED] number 02/1-13-3-371/08, dated 21 February 2008

474. Death certificate for [REDACTED], number 02/1-13-3-372/08, dated 21 February 2008
475. Death certificate for [REDACTED], number 02/1-13-3-373/08, dated 21 February 2008
476. Death certificate for [REDACTED], number 02/1-13-3-347/08, dated 21 February 2008
477. Death certificate for [REDACTED], number 02/1-13-3-375/08, dated 21 August 2008
478. Death certificate for [REDACTED], number 02/1-13-3-376/08, dated 21 February 2008
479. Death certificate for [REDACTED], number 02/1-13-377/08, dated 21 February 2008
480. Death certificate for [REDACTED], number 02/1-13-3-378/08, dated 21 February 2008
481. Death certificate for [REDACTED], number 02/1-13-3-379/08, dated 21 February 2008
482. Death certificate for [REDACTED], number 02/1-13-3-380/08, dated 21 February 2008
483. Death certificate for [REDACTED], number 02/1-13-3-381/08, dated 21 February 2008
484. Death certificate for [REDACTED], number 02/1-13-3-382/08, dated 21 February 2008
485. Death certificate for [REDACTED], number 02/1-13-3-383/08, dated 21 February 2008
486. Death certificate for [REDACTED], number 02/1-13-3-384/08, dated 21 February 2008
487. Death certificate for [REDACTED], number 02/1-13-3-385/08, dated 21 February 2008
488. Death certificate for [REDACTED], number 02/1-13-3-386/08, dated 21 February 2008
489. Death certificate for [REDACTED], number 02/1-13-3-387/08, dated 21 February 2008
490. Death certificate for [REDACTED], number 02/1-13-3-437/08, dated 25 February 2008
491. Death certificate for [REDACTED], number 02/1-13-3-389/08, dated 21 February 2008
492. Death certificate for [REDACTED], number 05-13-3-1/08, dated 25 February 2008
493. Death certificate for [REDACTED], number 02-13-3-1670/08, dated 25 February 2008

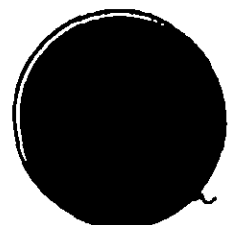
494. Death certificate for [REDACTED] number 02-13-3-1661/08,
dated 25 February 2008
495. Death certificate for [REDACTED] number 02/1-13-3-391/08,
dated 21 February 2008
496. Death certificate for [REDACTED] number 02/1-13-3-410/08,
dated 21 February 2008
497. Death certificate for [REDACTED] number 02/1-13-3-403/08,
dated 21 February 2008
498. Death certificate for [REDACTED] number 02/1-13-3-404/08,
dated 21 February 2008
499. Death certificate for [REDACTED] number 02/1-13-3-405/08,
dated 21 February 2008
500. Death certificate for [REDACTED] number 02/1-13-3-406/08,
dated 21 February 2008
501. Death certificate for [REDACTED] number 02/1-13-3-407/08,
dated 21 February 2008
502. Death certificate for [REDACTED] number 02/1-13-3-408/08,
dated 21 February 2008
503. Death certificate for [REDACTED] number 02-1-13-3-409/08,
dated 21 February 2008
504. Death certificate for [REDACTED] number 02/1-13-2-402/08,
dated 21 February 2008
505. Death certificate for [REDACTED] number 02/1-13-3-390/08,
dated 21 February 2008
506. Death certificate for [REDACTED] number 02/1-13-3-401/08,
dated 21 February 2008
507. Death certificate for [REDACTED] number 02/1-13-3-481/08,
dated 26 February 2008
508. Death certificate for [REDACTED] number 02/1-13-3-480/08,
dated 26 February 2008
509. Death certificate for [REDACTED] number 02/1-13-3-460/08,
dated 26 February 2008
510. Death certificate for [REDACTED] number 02/1-13-3-462/08,
dated 26 February 2008
511. Death certificate for [REDACTED] number 02/1-13-3-
467/08, dated 26 February 2008
512. Death certificate for [REDACTED] number 02/1-13-3-468/08,
dated 26 February 2008
513. Death certificate for [REDACTED] number 02/1-13-3-469/08,
dated 26 February 2008

514. Death certificate for [REDACTED], number 02/1-13-3-470/08, dated 26 February 2008
515. Death certificate for [REDACTED], number 02/1-13-3-471/08, dated 26 February 2008
516. Death certificate for [REDACTED], number 02/1-13-3-474/08, dated 26 February 2008
517. Death certificate for [REDACTED], number 02/1-13-3-475/08, dated 26 February 2008
518. Death certificate for [REDACTED], number 02/1-13-3-476/08, dated 26 February 2008
519. Death certificate for [REDACTED], number 02/1-13-3-477/08, dated 26 February 2008
520. Death certificate for [REDACTED], number 02/1-13-3-478/08, dated 26 February 2008
521. Death certificate for [REDACTED], number 02/1-13-3-479/08, dated 26 February 2008
522. Death certificate for [REDACTED], number 02-13-3-1701/08, dated 26 February 2008
523. Death certificate for [REDACTED], number 02/2-13-3-142/08, dated 25 February 2008
524. Death certificate for [REDACTED], number 02/2-13-3-141/08, dated 25 February 2008
525. Death certificate for [REDACTED], number 02-13-3-1671/08, dated 25 February 2008
526. Death certificate for [REDACTED], number 02-13-3-1672/08, dated 25 February 2008
527. Death certificate for [REDACTED], number 02-13-3-1673/08, dated 25 February 2008
528. Death certificate for [REDACTED], number 02-13-3-1674/08, dated 25 February 2008
529. Death certificate for [REDACTED], number 02-13-3-1675/08, dated 25 February 2008
530. Death certificate for [REDACTED], number 02-13-3-1676/08, dated 25 February 2008
531. Death certificate for [REDACTED], number 02-13-3-1664/08, dated 25 February 2008
532. Death certificate for [REDACTED], number 02-13-3-1663/08, dated 25 February 2008
533. Death certificate for [REDACTED], number 02-13-3-1662/08, dated 25 February 2008

534. Death certificate for [REDACTED] number 02-13-3-1660/08,
dated 25 February 2008
535. Death certificate for [REDACTED] 02-13-3-1659/08, dated
25 February 2008
536. Death certificate for [REDACTED] number 02-13-3-1653/08,
dated 25 February 2008
537. Death certificate for [REDACTED] number 02-13-3-1654/08,
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538. Death certificate for [REDACTED] number 02-13-3-1655/08,
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539. Death certificate for [REDACTED] number 02-13-3-
1656/08, dated 25 February 2008
540. Death certificate for [REDACTED] number 02-13-3-1657/08,
dated 25 February 2008
541. Death certificate for [REDACTED], number 02-13-3-
1652/08, dated 25 February 2008
542. Death certificate for [REDACTED] number 02-13-3-1651/08,
dated 22 February 2008
543. Death certificate for [REDACTED] number 02-13-3-1648/08,
dated 22 February 2008
544. Death certificate for [REDACTED] number 02-13-3-1649/08,
dated 22 February 2008
545. Death certificate for [REDACTED] 02-13-3-1650/08, dated
22 February 2008
546. Death certificate for [REDACTED], number 02-13-3-
1647/08, dated 22 February 2008
547. Death certificate for [REDACTED] number 02-13-3-1700/08,
dated 26 February 2008
548. Death certificate for [REDACTED] number 02-13-3-1699/08,
dated 26 February 2008
549. Death certificate for [REDACTED] number 1353, dated 3 March
2008
550. Death certificate for [REDACTED] number 1352, dated 3
March 2008
551. Order of the Federal Secretary for National Defense, confidential
number 5t.1042-1, dated 28 November 1991
552. Order, confidential number 2268-1, dated 30 December 1991
553. Territorial Defense mobilization plan, number: strictly
confidential number 05/1898-4/87

554. Order of the Command of the 2nd Military District, strictly confidential number 09/63-56
555. Conclusions of the Command of the 2nd Military District, dated 20 March 1992
556. Order of the Command of the 2nd Military District, strictly confidential number 09/80-23, dated 4 April 1992
557. Order of the Command of the 2nd Military District DT number 12/82-16, dated 10 March 1992
558. Request to the JNA, number 02-52/91, dated 11 December 1991
559. Conclusions and tasks from the session of the Military Council of the Federal Secretariat of National Defense, dated 23 May 1991
560. Decision of the Assembly of the Serb People, dated 24 October 1991
561. Decision on the formation of the Army of the Serb R BiH, number 03-234/92
562. Document of the Command of the 30th Partisan Division, strictly confidential number 865-2, dated 16 May 1992
563. List of the 2nd Military District, Federal Secretariat of National Defense and Air Force and Anti-aircraft Defense in the territory of the 2nd Military District
564. Document of the Command of the 2nd Military District, dated 24 April 1992
565. Document of the Command of the 2nd Military District, confidential number 32/198-100, dated 20 April 1992
566. Document of the Command of the 2nd Military District, confidential number 32/198-100/1, dated 26 April 1992
567. Tabular overview of the organization and establishment of the 2nd Military District
568. Document of the Command of the 2nd Military District, strictly confidential number 31/101-230, dated 7 April 1992
569. Document of the Command of the 2nd Military District, confidential number 31/103-6-1, dated 9 January 1992
570. Order of the Federal Secretary for National Defense, state secret "jedinstvo-2" /"unity-2"/
571. Order, strictly confidential number 06/1-79-121, dated 23 October 1990
572. Instructions from the President of the Movement for Yugoslavia
573. Note from the meeting of representatives of the Federal Secretariat of National Defense regarding the information from the Command of the 2nd Military District

- 574. Official note, number Kri 1/93, dated 2 January 1993
- 575. List of persons from Prhovo who were processed and imprisoned
- 576. Decision of the Republic Ministry of National Defense, number 1/92, dated 16 April 1992
- 577. Photographs of Marko Adamović
- 578. Excerpt from the Vob-8 form for Marko Adamović
- 579. Excerpt from the Vob-8 form for Boško Lukić
- 580. Order of the Commander of the Main Staff of the Army of Republika Srpska, strictly confidential number 30/18-25, dated 3 July 1992
- 581. Decision of the War Presidency, number 05-01-117/92, dated 21 July 1992
- 582. Order of the War Presidency of the Ključ Municipality, number 05-01-104/94, dated 8 November 1994
- 583. Boško Lukić's document sent to the Ministry of Defense of the Municipality of Serb Ključ (Ribnik)
- 584. Permit for Boško Lukić, number 01-38-RP/95
- 585. Decision on the appointment, confidential number 08/511-1, dated 6 December 1991
- 586. Certificate number 05-023-2039/96, dated 17 September 1996, issued in the name of Boško Lukić
- 587. Marko Adamović's military ID booklet
- 588. Minutes of the 4th session of the Executive Committee of the SDS Ključ, dated 14 October 1991
- 589. Minutes of the 5th session of the Executive Committee of the SDS Ključ, dated 24 October 1991
- 590. Order of the Ključ Municipal Assembly, number 05-01-54/92, dated 27 May 1992
- 591. Document of the Ključ Municipal Assembly, number 05-01-19/92, dated 26 February 1992
- 592. Decision of the Ključ Municipal Assembly, number 05-01-3/92, dated 10 January 1992
- 593. Request for the establishment of OŠTO /Municipal Territorial Defense Staff/ INT. number 06/26, dated 3 March 1992



Investigation results

The suspect Boško Lukić, teacher of All People's Defense and Social Self-Protection by profession, retired in the first half of 1991 from the position of the Secretary of the Secretariat of National Defense of the Ključ Municipality.

The suspect Boško Lukić was born on 25 November 1940 in Sanski Most. After he finished university and became a teacher of All People's Defense and Social Self-Protection, he worked in secondary school education institutions until he moved to the Secretariat of National Defense of the Ključ Municipality.

The suspect Boško Lukić retired in May 1991. However, although a pensioner, he accepted the position to which he was nominated by the Ključ SDS Municipal Board and took over the position of the Commander of the Territorial Defense Staff of the Ključ Municipality in January 1992, when his war record began. The list of the SDS activists and minutes of the SDS Municipal Board meetings suggest that the suspect Boško Lukić was an active member of the Serb Democratic Party in the second half of 1991, when he was nominated as a candidate for the position of the Commander of the Territorial Defense Staff and elected upon the completion of the procedure.

The SDS membership brought the suspect Boško Lukić in a more favorable position as compared to the prior Commander of the Territorial Defense Staff, Dušan Petrović, while his pronounced consistency in accepting the implementation of the Strategic Plan of the Serb People of Bosnia and Herzegovina brought him to the position from which Dušan Petrović was dismissed, despite disapproval expressed by other political parties which shared the power in the municipality, and without any explanation.

That position made it possible for him to become a member of the Ključ Municipality Crisis Staff by virtue of his office, and later a member of the Town Defense Command.

He remained in that position until late June 1992; more precisely, following the formation of the 17th Ključ Light Infantry Brigade, given the fact that he fulfilled the expectations and carried out the tasks assigned to him, he was promoted and appointed to the Command of the newly formed 17th Ključ Light Infantry Brigade as one of the assistants to the Commander Drago Samardžija.

The suspect Marko Adamović was born on 28 February 1946 in the village of Peći, Ključ Municipality. He completed a secondary teacher-training school, and then he started to pursue his life calling to be a professional serviceman during his compulsory military service, when he completed the school for reserve officers. Due to inadequate education, his actual military engagement began only in April 1992 in

the Ključ Battalion of the Territorial Defense, in the position of the Deputy Commander.

After the Crisis Staff formed by the SDS Executive Committee was transformed into the Crisis Staff of the Ključ Municipal Assembly, it received a certain number of new members, including Marko Adamović, who performed that office since the second half of May 1992.

The Town Defense Command was formed in accordance with the decision of the 30th Partisan Division and the suspect Marko Adamović became its Commander.

He remained in that position until around mid-June 1992, when, following the formation of the 17th Ključ Light Infantry Brigade, and due to his merits and performance of tasks assigned to him by that time, he was promoted and appointed as one of the assistants to the Commander Drago Samardžija, and in that capacity he became a member of the Command of the 17th Light Infantry Brigade.

The suspects Boško Lukić and Marko Adamović actively participated in the work of the Crisis Staff of the Ključ Municipality and were members of that body by virtue of their office; depending on their tasks, which followed from their tasks, they briefed on and put forward proposals relating to equipment and activities of the Ključ Territorial Defense units through the Territorial Defense Staff. Their role in the Crisis Staff and the Territorial Defense grew bigger and assumed characteristics of *de facto* and *de jure* power over the armed units in the area of the municipality by the formation of the Town Defense Command, whose Commander was Marko Adamović, while Boško Lukić was its member.

When the Crisis Staff of the Ključ Municipality was disbanded on 10 July 1992 by the Decision on Establishing the War Presidency in the Municipality, the suspects performed their activities only within the Army of Republika Srpska, more precisely, the 17th Ključ Light Infantry Brigade, while their function in the War Presidency was taken over by the Commander Drago Samardžija. They did not thereby lose their influence on the work and activities of the army; the suspect Boško Lukić and the suspect Marko Adamović were Assistants to the Brigade Commander Drago Samardžija, and thereby members of the Command of the 17th Ključ Light Infantry Brigade. That was also not the end of their activities within the scope of civilian authorities.

The suspects Marko Adamović and Boško Lukić were members of the War Presidency of the Ključ Municipality again in 1994, which made it possible for them to continue their active participation in the policy and decision making at the municipal level.

The evidence collected during the investigation which was conducted showed that the suspects Marko Adamović and Boško Lukić, after they were elected and became active in the Territorial Defense Staff and units, had *de facto* and *de jure* power, which made them very influential figures in the Ključ Municipality.

The power of the suspects Boško Lukić and Marko Adamović derived from two sources: on the one hand, from the political positions they held at the municipal level as members of the Crisis Staff, which was the highest body of the civilian authorities, and on the other hand, from their being professional soldiers in the Territorial Defense Staff and the Town Defense Command.

The Crisis Staff of the Ključ Municipality and the Territorial Defense Staff of the Ključ Municipality played an important role in the implementation and realization of the Strategic Plan of the Serb Democratic Party in the takeover of control of the municipality by Serbs and its linking with other Serb-populated areas, and in this way participated in the creation of a separate BiH state, from which the majority of non-Serbs would be permanently removed, so that the survival of the newly created Serb state would not be threatened.

The Municipality of Ključ is located on a part of the main road Sarajevo-Bihac, and it belongs to the Federation of Bosnia and Herzegovina. The Municipality of Ključ covered an area of 850 square kilometers and bordered with five municipalities: Mrkonjić Grad from the east side, Bosanski Petrovac from the west, Sanski Most from the north, Drvar from the south-west side, and Banja Luka from the north-east side, in the area of Manjača. Until 1992, the territory of the present Municipality of Ribnik, which is now located in Republika Srpska, was part of the Municipality of Ključ.

According to the report on ethnic affiliation in the territory of the Ključ Municipality made on the basis of the 1991 census, the population was 37,391, out of which there were 18,506 Serbs or 49%, 17,696 Muslims or 47%, 330 Croats or 1%, and 859 others or 2%.

The following settlements, among others, were predominantly or exclusively inhabited by Muslims: Donji Biljani with 1,552 inhabitants, out of which 1,509 were Muslims and 2 were Croats, Crljeni with 553 inhabitants, out of which 507 were Muslims, Dubočani with 304 Muslim inhabitants, Gornji Ramići with 647 inhabitants, out of which 614 were Muslims and 12 were Croats, Gornji Vojići with 275 Muslim inhabitants, Hadžići with 1,553 inhabitants, out of which 1,490 were Muslims and 38 were Croats, Hasići with 431 inhabitants, out of which 415 were Muslims, Krasulje with 1,821 inhabitants, out of which 1,815 were Muslims and one was Croat, Prhovo with 358 inhabitants, out of which 251 were Muslims, Sanica with 2,241 inhabitants, out of which 1,526 were Muslims and 4 were Croats,

Velagići with 676 inhabitants, out of which 631 were Muslims and 20 were Croats, Velečevo with 525 inhabitants, out of which 500 were Muslims, and Zgon with 690 inhabitants, out of which 678 were Muslims.

The fact that at least 500 non-Serbs were killed and at least 10,000 were expelled during the relevant period in the territory of the Ključ Municipality indisputably confirms that the Serb authorities in Ključ undertook activities to realize the objectives stated in the Strategic Plan.

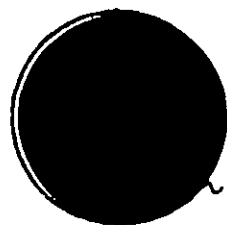
The disintegration of Yugoslavia had a particular influence on the activities of the Bosnian Serbs, who became dissatisfied with the fact that Bosnia and Herzegovina might proclaim its independence, as already done by other republics which belonged to the federal state of Yugoslavia. For that reason, through their political party - SDS, they began preparations to organize the part which they thought belonged to Serbs in autonomous regions and districts, which would remain as federal units within Yugoslavia, in which Serbia and Montenegro still remained. In that respect, they undertook all activities to establish the autonomous district, and those decisions were verified in the Assembly of the Serb People, which was established later.

Under the right of people to self-determination, in October 1991 the Serb Democratic Party established the Assembly of the Serb People, where they verified decisions which they had issued earlier. Some of the decisions were contrary to the then applicable Constitution of the Socialist Republic of BiH, such as the proclamation and establishment of the Autonomous Region in BiH, including the Autonomous Region of Krajina (ARK). According to the same decision, the Municipality of Ključ, among others, belonged to the Autonomous Region of Krajina. The decision on the establishment of Republika Srpska BiH was made in the same Assembly of the Serb People of BiH. All decisions which were made in the then Assembly were published in the Official Gazette of the Serb People in BiH.

The Republic created in this way changed the name into the Serb Republic of Bosnia and Herzegovina on 9 January 1992, and then on 12 August 1992 it was renamed Republika Srpska.

At the session held on 12 May 1992, the Assembly of the Serb People made a decision on the Strategic objectives of the Serb people in BiH. The first strategic objective was "to establish state borders with the other two ethnic communities".

In order to make preparations for the implementation of the decisions of the Serb People in BiH, on 19 December 1991 the SDS Main Board issued the *Instructions for the Organization and Activity of Organs of the Serb People in BiH*. The Instructions contain preparations for the takeover of power by the SDS and the



division of BiH along ethnic lines, which were made on the basis of the Decision on the territories which should comprise Republika Srpska BiH.

The Instructions dated 19 December 1991 established the manner of the takeover of power in municipalities in the BiH territory, depending on whether Serbs were in the majority in a certain municipality. In accordance with the Instructions, the municipalities in which Serbs were the majority of the population were to stop complying with the laws of the Republic of BiH and carry out tasks given by the parallel Serb authorities, which had already been established (Variant A). According to the Instructions, the territories where Serbs were in the minority were to be divided and new, exclusively Serb institutions were to be created (Variant B).

In order to implement the Decisions and the Instructions, the Serb Democratic Party established a structure of authority in municipalities which was characteristic of the functioning of governmental institutions in the case of war and immediate threat of war.

For that purpose, Crisis Staffs were established throughout the territory of the Serb Republic of BiH which was created, namely Crisis Staffs of the autonomous regions and municipalities, including the Crisis Staff of the Autonomous Region of Krajina and the Crisis Staff of the Ključ Municipality, which was a constituent part of that Autonomous Region.

Following the policy of the Autonomous Region of Krajina and their guidelines, at its sixth session held in December 1991, the SDS Executive Committee in Ključ established the Crisis Staff in accordance with the *Instructions of 19 December 1991*, pursuant to which, among other things, a new organization was supposed to be made "by using a secret, previously established procedure". The result of that secret establishment in accordance with the SDS leadership instructions was that crisis staffs were originally exclusively SDS party bodies.

The role of Crisis Staffs / War Presidencies in the Serb R BiH

The Crisis Staffs were formed on the model of the same bodies which existed in the Yugoslav defense system. They were designed to take over the functions of municipal or republic authorities in time of war or immediate threat of war, when the Assembly, as the highest authority body, cannot function. From the moment when the Crisis Staffs started functioning, they had and exercised all executive and legislative powers, while they included representatives of the police, military and the state administration bodies.

In April 1992, the President of the National Security Council of the Serb Republic of BiH ordered to start implementing the *Instructions of 19 December*

1991 and then the Government of Republika Srpska issued the Instructions for the work of crisis staffs of the Serb people in general. After the Ministry of Defense declared the state of imminent threat of war on 16 April 1992, the Crisis Staffs were transformed from party to governmental bodies. The activity of the crisis staffs did not change, nor did the composition of crisis staffs or their policy change. Actually, those were the same bodies and the majority of them still considered them as bodies of the SDS, as much as of the newly proclaimed state.

According to the Government Instructions, the Crisis Staffs were supposed to assume functions of the municipal assemblies when they were unable to convene due to the state of war. The Crisis Staff was supposed to coordinate the functions of authorities in order to ensure the defense of the territories, the safety of the people and property, the establishment of government and the organization of other areas of life and work. The Crisis Staff was supposed to collect information relating to the situation in the field, brief on that and consult with the relevant bodies of the Serb Republic of BiH.

The need of the Bosnian Serb leadership to legalize and centralize the Crisis Staffs was the cause of the abolishment of the Crisis Staffs and the establishment of War Presidencies, and later War Councils, instead of them.

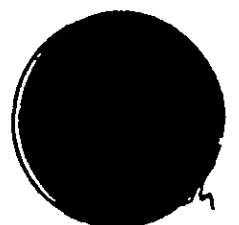
In late May 1992, the Serb Presidency of BiH issued the *Decision on the Formation of War Presidencies in Municipalities in Times of War or the Immediate Threat of War*.

The crisis staffs were supposed to stop their activities when the war presidencies were established.

The Decision on the Formation of War Presidencies provides that the War Presidency should organize, co-ordinate and adjust activities for the defense of the Serb people and unlawful municipal authorities, perform all the duties of the Assembly and the executive body, create and ensure conditions for the work of military bodies and units in defending the Serb nation, and carry out other tasks of state bodies if they are unable to convene.

The Decision of the Serb Presidency of BiH regarding the war presidencies was implemented by the Ključ Crisis Staff in July 1992. The change of name from the Ključ Crisis Staff to the Ključ War Presidency was purely cosmetic. There was no change in the duties and functions of the Crisis Staff and no significant change in the membership of the Crisis Staff. Practically, it was the same body.

Crisis Staffs were one of the most important instruments of the policy of the Bosnian Serb leadership, which exercised not only legislative, but also executive authority. The Decisions of the Crisis Staff of the Autonomous Region of Krajina (ARK) of 28 and 29 May were implemented by the municipal authorities and the police. The municipal Crisis Staffs, when they started implementing the ARK conclusions, were aware of and ordered the attack on Muslim and Croat villages and



settlements and managed and coordinated activities in order to implement the ARK decisions and conclusions.

The central role of the Crisis Staffs was to ensure the coordination of operations of the police and military and paramilitary formations, which had their own command structure, with the party and government policy.

The Crisis Staffs were one of the most important instruments of the policy of the Bosnian Serb leadership, which exercised not only legislative, but also executive authority. They were the highest bodies of municipal authorities in the Bosnian Serb claimed territories. The central role of the Crisis Staffs was to ensure the coordination of operations of the police and military and paramilitary formations, which had their own command structure, with the party and government policy. Different command structures were gathered in the Crisis Staffs based on their composition.

The composition of the Crisis Staff of the Ključ Municipality is the best example which reflects the coordinating role of that body. Its members were the President of the Municipal Assembly, Chief of the Public Security Station, Secretary of the Secretariat of National Defense, Commander of the Territorial Defense, President of the SDS Municipal Board, local delegate in the Bosnian Serb Assembly, as well as the President of the Executive Committee and the Commander of the Town Defense Command.

The SDS Crisis Staff for Ključ received the Government *Instructions* and acted in accordance with them. The Crisis Staff expanded so as to include a certain number of representatives of local authorities and it was transformed into the Crisis Staff of the Ključ Municipal Assembly. Since then the Crisis Staff also included the position of the Secretary for economy, budget and public resources and the position of the Secretary of the Municipal Assembly. That was not the final composition either; it changed, as well as the persons who occupied certain positions, important for the implementation of the *Strategic Plan* and the *Instructions*.

The Ključ Crisis Staff carried out the most activities from April to August 1992. According to its own Work Report, it acted as the highest administrative body, which had all prerogatives of the Municipal Assembly and made all decisions and conclusions that were within the competence of the Assembly, with the obligation that its decisions be ratified by the Municipal Assembly when conditions for that are created. Evidence shows that in the period after the takeover of institutions in the Ključ Municipality by Serbs on 7 May 1992, the Crisis Staff met frequently, almost every day, and on those occasions they discussed the local political situation and considered orders and policy of higher bodies, such as orders of the ARK Crisis Staff and the RS Government.

At its meetings, the Crisis Staff adopted numerous decisions, orders and other acts relating to all segments of life in the Ključ territory. It issued decisions, ranging from those relating to mobilization, transportation of prisoners, to school enrolment and economic and agricultural activities, and all the decisions aimed at controlling the municipality and taking control of all life segments.

Regional bodies and the Presidency and the Government of RS issued orders to the crisis staffs, and the crisis staffs cited these orders as grounds for their actions, which also included the removal of the non-Serb population from the municipality.

In accordance with this, on 8 May 1992 the Crisis Staff of the Ključ Municipality announced that it was obliged to apply laws and decisions passed by the Bosnian Serb Assembly and the Assembly of the Autonomous Region of Krajina, since the Municipality of Ključ joined the ARK, which was part of Republika Srpska. It was stated that all administrative bodies in the Municipal Assembly should continue performing their regular duties, but that all decisions should be adopted and tasks carried out in accordance with the regulations and decisions of the ARK and the Assembly of the Serb People.

Following this announcement, the Ključ Crisis Staff adopted decisions and conclusions in accordance with the decisions of the ARK Crisis Staff and constantly emphasized that it supported the activities and decisions of the ARK Crisis Staff and that they were binding. It sent its members to the ARK Crisis Staff sessions and was briefed by them on decisions and conclusions of the ARK Crisis Staff. When deciding on the policy of employment and the position and status of Muslims, it relied on the ARK Crisis Staff.

Regardless of this fact, the Crisis Staff of the Ključ Municipality did not only execute orders of the ARK Crisis Staff, but it was also a crucial initiator of the establishment and maintenance of Serb control over the Serb claimed territory in *the Bosnian Serb state* and they had discretion to implement orders, decisions and conclusions of the Serb leadership in their territory.

It indisputably follows from the evidence collected during the investigation that the Ključ Crisis Staff coordinated, supported and issued orders to various forces that were engaged, while its composition ensured the implementation of its decisions. The Crisis Staff functioned as a necessary part of the Ključ Municipality system.

The objectives of crucial and vital significance for the success of the general Strategic Plan for the creation of the Serb Republic of BiH were also implemented in the area of the Ključ Municipality and, in order to establish and maintain Serb control over the territory, the majority of non-Serbs were to be permanently removed from the municipality. In order to implement the Strategic Plan, the Crisis Staff of

the Ključ Municipality, as well as other Serb municipalities, took actions in at least three key areas, such as dismissals of non-Serb professionals, disarmament of paramilitary units and individuals who illegally possessed weapons, selectively enforced against non-Serbs, and resettlement of the non-Serb population.

Measures that were taken by the Ključ Crisis Staff completely ensured Serb control over the entire Ključ Municipality. Therefore, crisis staffs decisions contributed to the commission of crimes against non-Serbs.

On 27 May 1992 the Ključ Crisis Staff made a conclusion that until 1 June 1992 all non-Serb staff that was at that time employed at various positions involving possible independent decision making and the protection of property should be dismissed, while on 21 July 1992 the Ključ War Presidency decided that definitely only Serbs who were loyal to the Serb R BiH could be employed at strategically important positions, such as managerial positions involving a likely flow of information and protection of public property, and other positions of importance for the functioning of economic enterprises. After this decision, the War Presidency issued decisions on the dismissal of non-Serbs from positions in the municipality, including [REDACTED]

The fact that [REDACTED]

[REDACTED] after all authority bodies in the municipality had been taken over by Serbs, tried to continue working as representatives of the legally elected municipal bodies of Ključ within R BiH, but on the premises of the Cultural Centre in Podunavlje, since they were denied access to the Municipal Assembly building and their offices, the Crisis Staff of the Ključ Municipality labeled as the creation of the Muslim Municipality of Ključ in the territory of the Serb municipality and declared them illegal. In accordance with the Crisis Staff positions, Serbs who were loyal to the newly established authorities were chosen to occupy their positions.

At the time when such a decision was issued, these and other persons who were dismissed in accordance with the decision of the War Presidency had already been unlawfully deprived of liberty.

Although from 27 May 1992 Muslims and Croats in Ključ lost their jobs, the War Presidency issued an additional decision on 7 August 1992 and requested from all state bodies, socially-owned companies, mixed and public companies, as well as public institutions in the territory of the Ključ Municipality, to terminate employments of those who took part in the armed uprising. It was a complete farce, which was to be satisfied in writing, since it is a fact that the majority of those whose employments were terminated at that time and in that manner had been unlawfully

imprisoned in the *Manjača* camp or had fled from the area of the municipality much before the issuance of this decision. Although this decision formally referred to all citizens, it is a fact that it affected exclusively Muslims and Croats, who were arrested during the widespread and systematic attack against the civilian population, or who fled from the territory of the municipality before or during that attack.

On 27 May 1992, the Crisis Staff of the Ključ Municipality ordered that the movement from one part of the municipality into another should be prohibited without a special pass issued by the Ključ Public Security Station, while on 4 June 1992, it issued an order imposing a curfew and forbidding citizens from gathering in groups and moving from one village to another without a special pass.

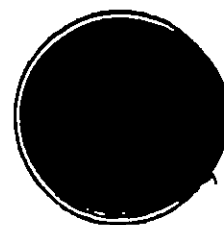
The implementation of the Strategic Plan included disarmament, and on 9 May 1992, following the ARK Crisis Staff decision of 4 May 1992, the Ključ Crisis Staff issued an ultimatum that all paramilitary formations and individuals who illegally possessed weapons and ammunition should surrender them to the municipal Territorial Defense Staff or the nearest police station immediately, but no later than 15:00 hours on 11 May 1992. The deadline was extended several times until 28 May 1992, when the Ključ Crisis Staff issued the final ultimatum, ordering to all citizens who possessed illegally acquired weapons to surrender them to the Ključ Public Security Station, Ključ Territorial Defense Staff or the nearest police station, and if the order should not be complied with, rigorous measures would be imposed to carry out disarmament, which could have disastrous consequences for both public and property security.

At the same time, [REDACTED] who was considered the Commander of the *Green Berets*, was called to surrender, while the Muslim inhabitants of the local community Velagići and the local community Pudín Han were called to gather in front of a wood-processing company in Ključ.

Before the expiration of the ultimatum, Serb forces started shelling Velagići and Pudín Han, and for that reason inhabitants were leaving and running away from the villages, hiding in the nearby forests; some civilians were killed while running away.

The policy of resettlement within the ARK municipalities was coordinated by the Crisis Staffs, in accordance with the ARK Crisis Staffs. That policy included different aspects, such as detention of Muslims and Croats, their removal from the municipal territories and the appropriation of their property, as well as its redistribution.

Although they referred to voluntary actions in accordance with the same and reciprocity, the resettlement took place because of the intolerable conditions imposed on them by the Serb authorities, such as shelling, looting, destruction of



Muslim settlements and houses, dismissals from work and other crimes committed during the realization of the "ethnic cleansing" policy.

In order to implement the policy of resettlement of non-Serbs from the municipality in the best possible way, on 27 May 1992 the Ključ Crisis Staff established the Agency for the reception and resettlement of refugees from one region into another. A few days later, on 4 June 1992, it issued a decision on the criteria and conditions under which citizens who wanted to leave the municipality were allowed to do so. Then, at its session held on 30 July 1992, it established formalized criteria for moving out of the municipality. These criteria included a statement on voluntary permanent moving out, exchange of property within three months with other individuals who moved in the territory of the municipality or putting the property at the disposal of the Ključ Municipality as a "gift", certified list of movable property which they would take with them, approval of the Secretariat of National Defense to leave the municipality and, finally, the certificate of permanent resettlement, issued by the Public Security Station on the basis of the mentioned documents.

In accordance with the decision of the ARK Crisis Staff dated 3 June 1992, individuals leaving the territory of the municipality were allowed to take a maximum of 300 DM or the corresponding amount in other currencies.

The Ključ Crisis Staff supervised the systematic collection and redistribution of non-Serb property in the way that it forced those who were expelled to put their property at the state's disposal and declared abandoned private family houses state property. Special contingents were formed for the collection of seized property which belonged to Muslims and Croats, and then furniture and other important household items were allocated in accordance with the established conditions and procedure for allocation. Families of soldiers who were killed, disabled veterans, refugees and other Serbs had the right to take part in that allocation.

In order to ensure that non-Serbs would not return and claim their property again, on 27 May 1992 the Ključ Crisis Staff forbade families who left without a valid reason from returning.

All these facts, namely that they were forced to yield their property when they were leaving, that the amount of money which they could take with them was limited, and that they were not allowed to return, indicate that the Crisis Staff did not treat them as refugees or displaced persons, but rather it could be said that it took part in the policy of ethnic cleansing of the municipality of non-Serbs.

Representatives of the Ključ Municipality supported the policy of creating a predominantly Serb state and undertaking activities to move out Muslims and Croats, until reaching such a level that the Serb authority could be exercised and maintained in the municipality.

The Ključ Crisis Staff took over the control of the local radio station in order to ensure the execution of its orders, decisions and conclusions in the three key areas. In accordance with the Crisis Staff instructions, the radio station *Ključ* announced its orders and decisions, and the Crisis Staff requested that broadcasts be given in accordance with their orders and policy, that is, in accordance with the Crisis Staff instructions.

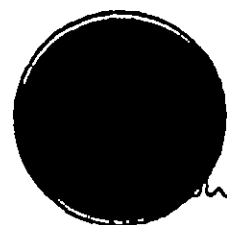
The military role of the Crisis Staff

The Crisis Staff of the Ključ Municipality, as well as other crisis staffs, played a central role in the coordination of military activities. By the Instructions dated 19 December 1991, the crisis staffs were instructed to cooperate with command posts and JNA Staffs.

Commanders of the Serb Army regularly participated in the Crisis Staff sessions in Ključ and they had very good cooperation and coordination with the Crisis Staff.

The Commander of the RS Army, Drago Samardžija, was appointed as a permanent member of the Ključ War Presidency, and members of the Crisis Staff were routinely briefed on the current military situation in the field and at the front and on the progress of combat activities. In addition, the Ključ Crisis Staff was involved in decisions and other issues relating to the army, such as the assistance in mobilization, establishment of new light brigades, finance and procurement issues, which included armament, removal of non-Serbs from the army, transfer of detainees to camps and of other non-Serbs from the municipality, and the surrender of weapons. Moreover, members of the Ključ Crisis Staff went to visit frontlines, where reports were submitted to them by military personnel in order to get an insight into the situation. Those Crisis Staff members later briefed other Crisis Staff members on military war campaigns. Therefore, it can be concluded that all important issues from the military domain were not decided on without the Ključ Crisis Staff. Although that relationship between the Crisis Staff and military authorities was not always perfect.

Thus, on 4 May 1992 the command of the 30th Partisan Division asked the command of the 5th Corps to intervene, because they thought that Serb extremism was increasing in Ključ and that the President of the municipality requested to have



his own army. The situation was serious enough that Major General Talić requested a detailed report about Serb extremism in Ključ and after that requested from the ARK to exert pressure on the authorities in Ključ and stop extremists, in order to avoid further misunderstandings and conflicts with JNA units.

Talić explicitly noted that extremism and contempt for all that did not belong to Serbs existed in the Municipality of Ključ. He stated that "Chetnik units" were formed, that desertion from the JNA units was encouraged, and that the President of the Municipal Assembly tried to command the JNA units in that region.

On 27 May 1992, the Ključ Crisis Staff concluded that the military authorities would execute orders of the civilian authorities, that the civilian authorities would not interfere with the way these orders were executed, and on the same day it appointed personnel of the battalion command. The Ključ Crisis Staff directly interfered with the military commanding and operations, which included the engagement of companies, appointment of the brigade commander and municipal defense command, as well as approving orders issued by the brigade commander. Finally, members of the Ključ War Presidency publicly assigned themselves a military role by allowing themselves to wear uniforms and carry weapons.

On 16 June 1992, the Ključ Crisis Staff decided that it would remain the highest authority body and that it would cooperate with the military command.

In accordance with the order of the Command of the 30th Division, dated 31 May 1992, the Ključ Defense Command was established, and its primary task was "the protection of the Serb people in the wider area of the municipality by occupying positions in the areas where combat operations have been carried out until now (the area inhabited by the Muslim population), control of access and entry roads to the municipality, the establishment of the Army of the Serb Republic of BiH in the entire area of the municipality..."

According to the same order, the Ključ Defense Command was composed of officials of municipal structures – civilian and the Territorial Defense.

It follows from the minutes of the Ključ Municipality Crisis Staff sessions that the Commander of the Defense Command was Marko Adamović. It is characteristic that the Town Defense Command was composed of a certain number of persons who were members of the Crisis Staff at the same time, such as the Commander of the Territorial Defense Staff, the Chief of the Public Security Station, and the President of the Municipality, and that the Crisis Staff was regularly briefed about the situation in the field by representatives of the army and police authorities, while the Crisis Staff made certain conclusion and decisions on the basis of those reports.

Boško Lukić's role in the Crisis Staff and the Town Defense Command

The suspect Boško Lukić had a significant role in the establishment of the first armed formations, which were the forerunner of the Army of Republika Srpska. As the Commander of the Ključ Territorial Defense Staff, he also played a crucial role in the appointment of suitable personnel to the command posts in the then formed armed units of the Territorial Defense. His role was particularly prominent until the formation of the 17th Ključ Light Infantry Brigade of the Army of Republika Srpska and the abolishment of the Crisis Staff of the Ključ Municipal Assembly on 10 July 1992, when Drago Samardžija assumed the main role in the army as the Commander of the 17th Ključ Light Infantry Brigade.

Given that the suspect Boško Lukić was an SDS activist since the first multiparty elections in 1990, when the Crisis Staff of the Ključ Municipality was established, Boško Lukić became its permanent member. Due to the fact that the suspect Boško Lukić was the Commander of the Territorial Defense Staff of the Ključ Municipality, he automatically became a member of the Crisis Staff of the Ključ Municipality. As it is evident from the minutes of the Crisis Staff meetings, at the meetings the suspect Boško Lukić mostly briefed about military issues, which included mobilization, equipment, armament, as well as orders to carry out military operations in the Ključ area. The aim of his briefings was not only to merely inform other members of the Crisis Staff about activities of the military units, but to inform the Crisis Staff about the implementation of the Crisis Staff conclusions and reaching new ones, depending on the needs. This is supported by the Crisis Staff session held in the first half of June 1992, where the suspect Boško Lukić put forward proposals for obtaining equipment which would be necessary for the future 17th Ključ Light Brigade. When the widespread attack against the civilian population started, the agenda of all Crisis Staff sessions included an item relating to military operations. The suspect Boško Lukić and the suspect Marko Adamović were responsible for giving a briefing about this item of the agenda.

Before the establishment of the Crisis Staff of the Ključ Municipality, all important political and military decisions were made by the SDS Crisis Staff of the Ključ Municipality, which was established in December 1991 and which became the Crisis Staff of the Ključ Municipality in the first half of May 1992, while on 10 July 1992, when the War Presidency of the Ključ Municipality was established, the name Crisis Staff was cancelled, as already described.

The Crisis Staff issued crucial decisions for the overall functioning of the Ključ Municipality in war conditions. The Crisis Staff had the supreme control of

the Serb military units which were established by the Territorial Defense at the very beginning.

The Ključ Municipality Crisis Staff issued orders and assisted the Territorial Defense in the preparation for the war, issued orders for mobilization and armament, but also disarmament and seizure of weapons from persons who they considered to have posed a threat to the establishment and survival of the Serb Municipality of Ključ within the Autonomous Region of Krajina and, ultimately, to the creation and sustainability of the Serb Republic of BiH.

In this period, the Crisis Staff was the supreme military and civilian authority in the area of the Ključ Municipality, and thereby members of the Crisis Staff who participated in the decision making or the implementation of those decisions through departments to which they belonged were the persons who had the greatest power in the municipality during the relevant period, including the suspect Boško Lukić.

Together with others, Boško Lukić promoted, participated in and incited the implementation of the policy aimed at achieving the objective of the joint criminal enterprise, namely the forcible and permanent removal of the majority of the Muslim and Croat population of the municipality within the widespread and systematic attack against the civilian population. He played a significant role in supporting the work of the Crisis Staff, which governed the Ključ Municipality during the relevant period of time and implemented the objective of the joint criminal enterprise. He assisted in the reorganization and recruitment for the Territorial Defense and was the leading figure in the Territorial Defense structures and, as the Commander of the Territorial Defense Staff, he was a superior to the mobilized and armed units of the Ključ Battalion, which participated in the committed crimes. He cooperated with Vinko Kondić, the Chief of the police, who were involved in the commission of crimes, acting together with the units of the Territorial Defense of the Ključ Battalion. He took part in providing financial, material, logistics and political support for the military occupation of territories. He facilitated the participation of some units of the 30th Division of the 1st Corps of the JNA in the occupation and control of the Ključ Municipality territory. He actively encouraged and directly engaged in the procurement of arms and their distribution to Serbs in order to carry out the campaign of persecution.

The Prosecutor's Office of BiH has no evidence that the suspect Boško Lukić directly participated in killings, but he certainly knew that civilians would be killed during the forcible removal of the Muslim and Croat civilians and that killings in that attack were a result of the campaign of persecution.

As the Commander of the Territorial Defense Staff, a member of the Town Defense Command and a member of the Crisis Staff of the Ključ Municipality, he must have been aware of particular killings that took place. Although he was aware

of the crimes which were committed, he did not do anything to prevent them or punish their perpetrators.

Almost the entire Muslim population and the entire Croat population was expelled from the Municipality of Ključ by forcible removal or making them flee, spreading fear of armed attacks or any other attack. More than 500 civilians were killed, including women and old people, while several thousand civilians were imprisoned in the Public Security Station and the Primary School *Nikola Mačkić*, and then in the camps *Stara Gradiška* and *Manjača*. The actions that Boško Lukić carried out together with other members of the bodies and organizations to which he belonged and other officials and leaders of the military and civilian authorities in the territory of the Ključ Municipality and the Autonomous Region of Krajina, had very severe consequences for victims and their relatives.

Boško Lukić bears individual criminal responsibility for the crimes described in this Indictment. The suspect perpetrated or otherwise aided or abetted in the planning, preparation or commission of the crimes which took place. He participated as co-perpetrator or aider and abettor in the joint criminal enterprise, which started not later than the second half of 1991 and lasted at least until mid-June 1992. The purpose of this joint criminal enterprise was to forcibly and permanently remove the majority of the Croat and other non-Serb population from the area of the conceived territory of the Bosnian Serb state.

Marko Adamović's role in the Crisis Staff and the Town Defense Command

When the suspect Marko Adamović was appointed as the Deputy Commander of the Ključ Battalion of the Ključ Territorial Defense, he became a member of the Ključ Municipality Crisis Staff at the same time. As a person who fulfilled his role as a reserve officer and the role in the Crisis Staff, he was appointed as the Commander of the Town Defense Command, and then his role became particularly prominent all until the formation of the 17th Ključ Light Infantry Brigade of the Army of RS, when he moved to the position of one of the Assistant Commanders in that brigade.

At the Crisis Staff meetings, the suspect Marko Adamović briefed other members about military issues, which included the situation in the field, mobilization, equipment, armament, as well as orders to carry out military operations in the Ključ area. Just like the briefings by other members of the Crisis Staff regarding their respective departments, Marko Adamović's briefing did not merely aim at informing the Crisis Staff about the activities of the Territorial Defense military units, but also at informing the Crisis Staff about the implementation of its conclusions reached at previous meetings. The conclusion can

be drawn from the register of minutes that the suspect Marko Adamović, as the Commander of the Ključ defense, informed the Crisis Staff about the situation in the field on a daily basis.

The suspect Marko Adamović briefed the Crisis Staff as the body which issued key decisions for the overall functioning of the Ključ Municipality in war conditions. At the same time, that was the body which had the supreme control of the Serb military units which were established by the Territorial Defense at the very beginning. Marko Adamović, together with the suspect Boško Lukić and commanding officers of subordinated Territorial Defense units, comprised the Territorial Defense Staff, which had control over all Territorial Defense units which were formed.

The suspect Adamović was a member of the Crisis Staff during the period of time when the Crisis Staff was the supreme military and civilian authority in the area of the Ključ Municipality, and thereby, participating in the decision making or implementing them through tasks given to them in their respective departments, he had the greatest power in the municipality along with other members of the Crisis Staff.

Together with others, Marko Adamović promoted, participated in and incited the implementation of the policy aimed at achieving the objective of the joint criminal enterprise, namely the forcible and permanent removal of the majority of the Muslim and Croat population of the municipality within the widespread and systematic attack against the civilian population. He played a significant role in supporting the work of the Crisis Staff, which governed the Ključ Municipality during the relevant period of time and implemented the objective of the joint criminal enterprise. He assisted in the reorganization and recruitment for the Territorial Defense and was the leading figure in the Territorial Defense structures and, as the Commander of the Territorial Defense Staff, he was a superior to the mobilized and armed units of the Ključ Battalion, which participated in the committed crimes. He cooperated with the police of the Ključ Public Security Station, who were involved in the commission of crimes, acting together with the units of the Territorial Defense of the Ključ Battalion. He took part in providing financial, material, logistics and political support for the military occupation of territories. He facilitated the participation of some units of the 30th Division of the 1st Corps of the JNA in the occupation and control of the Ključ Municipality territory. He actively encouraged and directly engaged in the procurement of arms and their distribution to Serbs in order to carry out the campaign of persecution.

The investigation results show that Marko Adamović became a member of the Crisis Staff, which aimed at carrying out activities defined by the ARK War Staff. By the mobilization of police and Territorial Defense units, the Crisis Staff

coordinated and made preparations for the war. Members of the Crisis Staff intensively made arrangements relating to the JNA role in those war operations and for that reason meetings were held between JNA members and municipal officials.

Given that the suspect Marko Adamović attended the Crisis Staff sessions in his capacity as the Commander of the Ključ Battalion and the Commander of the town defense, he put forward proposals relating to accommodation, equipment and armament of the military formations in the Ključ Municipality area and further briefed about the situation on the frontlines, as well as about activities aimed at establishing a brigade in the Ključ Municipality area.

Bearing in mind all the positions he held, the impression is that Marko Adamović was motivated by the accumulation of power and a passion for power which would facilitate the implementation of the Strategic objectives in the area of the Ključ Municipality and place the Municipality of Ključ, permanently "cleansed" of Muslims and Croats, in the newly established Serb Republic of BiH.

Serb Territorial Defense

The armed forces of the SFRY /Socialist Federative Republic of Yugoslavia/ were built in accordance with the concept of all people's defense, elaborating forms and manner of mass resistance to the aggressor by the armed forces and people, the work of all socio-political structures, production, protection and carrying out of other tasks during the war. The armed forces were a single armed force in the system of all people's defense and were comprised of the Yugoslav People's Army and the Territorial Defense.

The Territorial Defense conceptually represented "the broadest form of organized, armed, all people's resistance in which, if necessary, all population fit for armed combat could also be involved. It was organized on a territorial principle in all socio-political communities, local communities and work organizations."

The Territorial Defense /TO/ was trained together with the JNA units or independently for carrying out combat operations. Operations of the JNA and the TO constituted the most important and crucial form of armed forces. The TO forces were organized by the competent body of the republic – province, regional community, municipality and work organization in accordance with the then applicable legal regulations.

The Territorial Defense consisted of staffs, units and institutions. The TO staffs existed in peacetime, while units and institutions were organized and prepared in peacetime and activated in case of war or immediate threat of war, as well as during exercises in peacetime.



The TO was activated for the purpose of combat tasks in accordance with the order issued by the Commander-in-Chief of the armed forces or bodies, or a senior officer authorized by him. Each socio-political community organized an adequate TO staff (republic, district, town and municipal).

The tendency in the Yugoslav People's Army was to reduce and then disband the territorial defense, which was regulated by the order of the Republic TO Staff of the Socialist Republic of Bosnia and Herzegovina /SR BiH/.

In the beginning of 1992, the situation in the field was such that the Territorial Defense in SR BiH was practically broken up and it developed depending on who was in the majority in a certain municipality. In the municipalities where Serbs were in the majority, the TO and JNA leaderships did not consider the un-disbanded and newly formed TO units to be paramilitary, but considered them desirable, while their retention in other municipalities was declared an act of disobedience.

In addition to the activities aimed at reduction and the tendency to disband the Territorial Defense, the Yugoslav People's Army undertook the process of taking away arms from the TO warehouses. In their opinion, the TO arms should be under control and put at safer places, such as warehouses under the JNA control. The municipalities which did not do so were urged to promptly act in accordance with the conclusions relating to the surrender of arms to the Yugoslav People's Army for safekeeping. It would turn out that the arms should have been under control, but it would also turn out that units of the TO Staffs of the municipalities which proclaimed themselves Serb municipalities were equipped with arms from those warehouses, as well as the Serb population in those municipalities.

After Bosnia and Herzegovina became independent, the Presidency of R BiH issued the Decree on the establishment of the Territorial Defense of the Republic of Bosnia and Herzegovina.

Simultaneously, the Assembly of the Serb People in Bosnia and Herzegovina annulled that decision because it was issued without representatives of the Serb people and passed the Law on the National Defense of the Serb People, by which it established a parallel Territorial Defense.

The Law on the National Defense of the Serb RBiH was passed on 28 February 1992 and under that Law the Territorial Defense was established as part of a single defense system of the Serb RBiH. Under this Law, the mobilization of manpower and reserve officers and arming of the Territorial Defense units was possible only if the President of the Republic declared immediate threat of war.

By issuing the decision on the appointment of the Chief of the Territorial Defense Staff and acting Commander of the Republic TO Staff at the joint session of the National Security Council and the Government of the Serb R BiH, authority to use the Serb Territorial Defense units was clearly given.

The decision issued by the Minister of Defense and the then appointed Commander of the TO Staff of the Serb R BiH emphasized that "all military-age men shall be available to the municipal TO staffs in the territory of the Serb R BiH."

From that moment, the municipal, regional and republic TO Staffs were in charge of mobilization, armament and command of the TO units. "Presidents of all national defense councils" were responsible for the implementation of the decision on general mobilization. The role of the municipal secretariats of national defense was particularly emphasized, and for that reason it can be concluded that the first units of the army of the Serb R BiH were mobilized and equipped by the municipal TO staffs and municipal secretariats of national defense. Subsequently, at the request of General Momir Talić, in the territory of the Autonomous Region of Krajina they were transformed into light infantry brigades within the 1st Krajina Corps, while the commanders of the municipal TO staffs had previously taken full command and control.

In addition to the role which the TO Staff and the Ministry of Defense played in mobilization and equipping the Serb TO units, the Yugoslav People's Army (JNA) provided significant assistance. In accordance with the previous reforms from 1990, arms and equipment of the territorial defense units were under the JNA control.

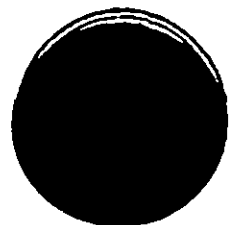
The first Serb TO units were equipped with arms exactly from the TO warehouses which were located within the JNA barracks.

The decision on the complete mobilization of manpower and military equipment of the TO and their subordination to the JNA units was never fully implemented.

The abolition of the effective control of the territorial defense by crisis staffs was implemented to a larger extent only after the formation of brigades and corps within the RS Army.

The Yugoslav People's Army carried out a dual policy, attempting to reduce interethnic tensions on the one hand and support and arm Serb volunteers and selected TO units on the other.

According to the documentation of the VRS Main Staff, the establishment of the Army of Republika Srpska was done in two directions, the first one being the takeover of control of the territory at the municipal and regional level, while the second phase was the complete formation of the RS Army.



It clearly follows from the documentation that the TO units, under the political and party influence of the Serb Democratic Party, formed the basis and that those units "provided the protection of the Serb people and liberated borders of their municipalities". After that, more precisely in mid-June 1992, under the decision of the RS Presidency on the establishment, organization, formation and command, the RS Army practically started organizing life and combat operations "aimed at accomplishing the basic Strategic objectives of war of the Serb people".

After the establishment of the 1st Krajina Corps, the strength increased through mobilization and new light infantry brigades were formed as combat units which evolved from the Serb TO and were attached to the already existing brigades and units of the corps. After that, orders were received exclusively from the corps command.

From mid-June 1992, the Ključ Battalion of the TO, which by that time had been re-subordinated to the 1st Corps, was re-subordinated to the Command of the 2nd Corps with the headquarters in Drvar when it transferred to the 17th Ključ Light Infantry Brigade which was formed.

During the formation and functioning of the RS Army, the emphasis was laid on the cooperation with civilian authorities at different levels of the command.

In the complex situation from April to sometime around September 1992, a number of crisis staffs, including the Crisis Staff of the Ključ Municipality, functioned as municipal governments in the Serb municipalities which should form part of the Serb Republic of BiH.

Radovan Karadžić suggested finding reserve officers for the crisis staffs who would introduce all those who had weapons and formations into an organized territorial defense and that, if the JNA was present in that area, they were mandatorily under its command.

Save for one engineer unit, there was no Yugoslav People's Army in the area of the Ključ Municipality, but it is absolutely certain that the 30th Division of the JNA, which was in the area of the neighboring municipality of Mrkonjić Grad, had influence and participated in the organization of and providing assistance to the Ključ Territorial Defense. Initially, until the formation of the 17th Light Infantry Brigade, the Ključ Territorial Defense formations were also part of the 13th Partisan Brigade of the 30th Division.

Boško Lukić's role as the Commander of the Ključ Territorial Defense Staff and a member of the Town Defense Command

The suspect Boško Lukić was an SDS activist for the area of the local community Sanica from the very first multiparty elections. He was an active SDS member, but also a subject of discussions at the sessions of the Ključ SDS Municipal and Executive Boards during 1991. Thus, at the session of the Ključ SDS Executive Board held on 14 October 1991, a proposal was put forward that the SDS Municipal Board should propose to the Ključ Municipal Assembly the suspect Boško Lukić as the Commander of the Ključ Territorial Defense Staff. It was not clearly pointed out what the SDS was guided by when it proposed a retired teacher of All-People's Defense as the Commander of the TO Staff instead of the then Commander Dušan Petrović, save for the remark that Dušan Petrović's term of office was expiring. It clearly follows from the evidence collected during the investigation that the SDS needed to have in that position a person who, by virtue of his office, would be a member of the municipal Crisis Staff, while within the relevant department he would implement all Crisis Staff decisions necessary for the formation of the Serb TO, mobilization and preparation of the Serb Territorial Defense units for the forthcoming armed conflicts.

In that period, non-Serbs, although their number was small and negligible, still worked in the Ključ Territorial Defense. The Deputy Commander of the TO Staff was Bosniak, but only formally, since he did not perform his duty in coordination with the Commander of the TO Staff after the appointment of Boško Lukić.

Following the order of the Commander of the Republic TO Staff and the Minister of Defense of SR BiH of 16 April 1992, based on which the Decision on general mobilization was issued on 4 May 1992, but now at the level of the ARK regional secretariat of national defense, Boško Lukić, in his capacity as the Commander of the TO Staff of the Serb Municipality of Ključ, was obliged to carry out general mobilization of both manpower (reserve officers and Serb military-age men) and necessary arms and equipment for the newly formed units. The very order for the general mobilization in the area of the Ključ Municipality was issued by the Ključ Municipality Crisis Staff, namely its President, Jovo Banjac, who authorized by the order the Commander of the Territorial Defense, Boško Lukić, to issue necessary decisions to carry out the order issued by the Commander of the Republic TO Staff.

However, the order of the Republic TO Staff Commander was sufficient for Boško Lukić, as the TO Staff Commander, to set up the command structure of the Ključ Battalion of the TO, with Branko Ribić and Marko Adamović at the head. The first lining up of the Ključ Territorial Defense units took place on 26 April 1992 in the village of Sitnica, Ključ Municipality. A significant role in the formation of this

battalion was played by the Ključ Municipal TO Staff, headed by the suspect Boško Lukić, who, in addition to the mobilization of manpower and reserve officers, made it possible for the battalion to be equipped with arms from the Ključ TO warehouse, which was located in the JNA barracks *Kula*, in the territory which belonged to the neighboring municipality of Mrkonjić Grad.

Members of the Crisis Staff and Commanders of the Serb TO, including the suspect Boško Lukić as the representative and Commander of the Territorial Defense of the Serb Municipality of Ključ, held a meeting with the command of the 1st Partisan Division concerning "the further cooperation with the JNA units regarding the securing of the territory and treatment of soldiers and senior officers of the units in the area of Serb Krajina." The objective of this meeting was the coordination of the JNA and the existing Serb TOs, more precisely, the existing Serb armed forces, aimed at the reorganization of the system of command and control of the armed forces that existed up to that time and the creation of the Army of Republika Srpska.

On the other hand, since late 1991 "the Serb paramilitary formations" were gradually brought under a single chain of command, with the municipal TO staffs (OŠTO) at the head. Thus an SDS order sent to the President of the Municipal Assembly requested that "paramilitary formations, if they exist, should be immediately reformed and transferred to the territorial defense..." In accordance with that order, all paramilitary units and persons who possessed personal weapons were obliged to surrender them to the municipal TO staffs. The ARK order regarding the general mobilization, dated 4 May 1992, called on "...all paramilitary units and individuals who illegally possessed weapons and ammunition to surrender the weapons to the municipal TO staffs not later than 15:00 hours on 11 May 1992..."

The first and basic task which the Serb TO Ključ had after the formation and recruitment to the units, besides the general mobilization and preparations for the war, was the disarmament of all other, non-Serb military formations. Following the ARK instructions, the Crisis Staff of the Serb Municipality of Ključ issued an ultimatum to the citizens of Ključ to surrender weapons, regardless whether they belonged to certain military formations and regardless on what basis they carried weapons.

The evidence will confirm that, after the call to surrender weapons, prohibitions of citizens movement followed as well as "mopping up of the terrain and processing of persons who did not surrender weapons" by the TO units, too, but all that referred to non-Serbs only. The Ključ citizens were informed about those activities via the radio *Ključ*.

The Ključ Battalion of the TO, together with members of the Public Security Station, supported by the remaining units of the 30th Division of the JNA, carried out disarmament in a planned, widespread attack against the civilian population of villages and settlements mainly inhabited by the Muslim and Croat civilian population, while this attack was carried out in the manner and had consequences as described in the operative part of this Indictment.

The evidence collected during the investigation indisputably confirms that Boško Lukić, together with others, promoted, participated in and incited the implementation of the policy aimed at realizing the objective of the joint criminal enterprise, namely the forcible and permanent removal of the majority of the Muslim and Croat population of the municipality within the widespread and systematic attack against the civilian population. He played a significant role in supporting the work of the Crisis Staff, which governed the Ključ Municipality during the relevant period of time and implemented the objective of the joint criminal enterprise. He organized and assisted in the reorganization and recruitment for the Territorial Defense, he was a leading figure in the TO structures and, as the Commander of the TO Staff, he was superior to the commanding officers and mobilized and armed units of the Ključ Battalion which participated in the committed crimes. As a member of the Town Defense Command, he participated in the management of all activities aimed at realizing the joint criminal enterprise, that is, in the execution of orders issued by the JNA Colonel Stanislav Galić.

The suspect Boško Lukić knew that civilians would be killed during the forcible removal of the Croat and Muslim civilians and that killings in that attack were a result of the campaign of persecution, but he agreed to such consequences.

As the Commander of the TO Staff and a member of the Town Defense Command, he must have been aware of particular killings that took place, even if he was not present there directly. The suspect was aware of the crimes which were committed, particularly of the crimes on a massive scale, but he did not do anything to prevent them or punish their perpetrators.

The suspect Boško Lukić bears individual criminal responsibility for the crimes described in this Indictment. The suspect perpetrated or otherwise aided or abetted in the planning, preparation and commission of the crimes which took place. He participated as a co-perpetrator or aider or abettor in the joint criminal enterprise, which started not later than the second half of 1991 and lasted at least until late August 1992.

The purpose of this joint criminal enterprise was to forcibly and permanently remove the majority of Croat and other non-Serb population from the area of the conceived territory of the Bosnian Serb state.

Marko Adamović's role as the Deputy Commander of the Ključ Battalion and the Commander of the Town Defense Command

The first independent Serb military unit in the area of the Ključ Municipality was formed on 18 April 1992 as a TO unit, which would later be known as the Ključ Battalion, and when the 17th Ključ Light Brigade of the Army of Republika Srpska was formed, all TO units from the area of the Ključ Municipality, the strength of three battalions, were a constituent part of that brigade.

The command of this unit was formed first and Marko Adamović was appointed as the Deputy Commander. The unit operated independently until it was subordinated to the 17th Light Brigade in mid-June 1992.

During the period of the formation of the Ključ Battalion, holding the rank of captain, the suspect Marko Adamović accepted the position of the Deputy Commander, took care of the training of Serb soldiers in Simica and organization of the Serb TO units, directly participated in the activities of the TO units from 27 May 1992 and pursued his military career in the 17th Ključ Light Brigade and further through the structures of the RS Army until his retirement.

The role of the suspect Marko Adamović as the Commander of the Town Defense Command included activities related to the formation, armament, equipment and accommodation of the Serb military units in the area of the Ključ Municipality, guidance and command of the TO units and coordination of activities with other military units in the area of the municipality when the armed, widespread and systematic attack against the civilian population began.

The suspect Marko Adamović, as the Commander of the Town Defense Command and a member of the Crisis Staff of the Ključ Municipality, but also as the Deputy Commander of the Ključ Battalion, was also involved in the formation of the 17th Light Infantry Brigade in the area of the Ključ Municipality. In the absence of the Brigade Commander, as the Deputy Battalion Commander, he performed all duties of the Battalion Commander. He took care of financial problems and equipment of the brigade and its preparation to carry out the planned tasks.

The evidence collected during the investigation indisputably confirms that Marko Adamović, together with others, promoted, participated in and incited the implementation of the policy aimed at realizing the objective of the joint criminal enterprise, namely the forcible and permanent removal of the majority of the Muslim and Croat population of the municipality within the widespread and systematic attack against the civilian population. He played a significant role in supporting the work of the Crisis Staff, which governed the Ključ Municipality during the relevant period of time and implemented the objective of the joint criminal enterprise. He assisted in the reorganization and recruitment for the Territorial Defense, he was one

of the leading figures in the TO structures and, as the Deputy Commander of the 3rd Ključ Battalion, he was a superior to the mobilized and armed units of the Ključ Battalion which participated in the committed crimes. As the Commander of the Town Defense Command, he managed all activities aimed at realizing the joint criminal enterprise, that is, executing orders issued by the JNA Colonel Stanislav Galić.

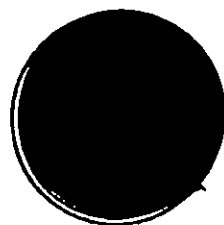
The evidence collected during the investigation indisputably confirms that the suspect Marko Adamović with his units directly participated in the widespread and systematic attack against the non-Serb civilian population and directly participated in "the mopping up" of the villages Vukovo Selo, Humići, Plamenice, Ljutića Brdo, Krantići and Prhovo, on which occasion individual and mass killings of men, women and children, inhabitants of those villages, were carried out.

The suspect Marko Adamović knew that civilians would be killed during the forcible removal of the Muslim and Croat civilians and that killings in that attack were a result of the campaign of persecution, and he agreed to such consequences and personally participated as a superior.

As the Deputy Commander of the Ključ Battalion and as the Commander of the Town Defense Command, he must have been aware of particular killings that took place even where he was not directly present. Although he was aware of the crimes which were committed, he did not do anything to prevent them or punish their perpetrators.

Almost the entire Muslim population and the entire Croat population was expelled from the Municipality of Ključ by forcible removal or making them flee, spreading fear of armed attacks or any other attack. More than 500 civilians were killed, including women and old people, while several thousand civilians were imprisoned in the Public Security Station and the Primary School *Nikola Mačkić*, and then in the camps *Stara Gradiška* and *Manjača*. The actions that Marko Adamović carried out together with other members of the bodies and organizations to which he belonged and other officials and leaders of the military and civilian authorities in the territory of the Ključ Municipality and the Autonomous Region of Krajina, had very severe consequences for victims and their relatives.

The suspect Marko Adamović bears individual criminal responsibility for the crimes described in this Indictment. The suspect perpetrated or otherwise aided or abetted in the planning, preparation or commission of the crimes which took place. He participated as a co-perpetrator or aider and abettor in the joint criminal enterprise, which started not later than the second half of 1991 and lasted at least until late August 1992. The purpose of this joint criminal enterprise was to forcibly and permanently remove the majority of Croat and other non-Serb population from the area of the conceived territory of the Bosnian Serb state.



Relationship between the police and the army

When implementing decisions of the Crisis Staff, the Territorial Defense closely cooperated with the police. That cooperation was a particularly important characteristic of many combat operations which were carried out against Muslim villages and settlements during 1992 under the pretext of disarming paramilitary formations or extremists and the attacks being provoked by the killing of a police officer at the entrance to the village of Krasulje and shooting at unarmed young soldiers in Busije at the very entrance to the Ključ from the direction of Pudín Han.

The cooperation between the army and the police had various forms, including regional and municipal networking, forwarding of orders or instructions, provision of equipment, joint operations, re-subordination of police units for combat operations, joint interrogations of prisoners, coordinated transfer of prisoners to other detention facilities and the transportation of those who were leaving the municipality.

The suspect Boško Lukić and the suspect Marko Adamović, by virtue of their office, attended the sessions of the Crisis Staff, which were also attended by the Chief of the Ključ Public Security Station, Vinko Kondić, who was a member. Therefore, there was a constant contact and continuous dialog among the most important figures in the police and the army in the municipality, in the way that they exchanged orders, requests, instructions and information, which also included reports relating to combat operations and activities of the regular and reserve police forces, as well as requests for manpower.

Joint operations of the army and the police were common. Even before combat operations began, mixed checkpoints made of the army and police forces had been established. Cooperation also existed in mopping up of the terrain, which follows from a report of the 1st Krajina Corps, which says: "the situation in the field is under control and the cooperation with the police stations and authorities is completely established".

Attacks against the civilian population in the wider area of Ključ were carried out in a joint, coordinated operation of the army and the police, and in the spring and summer of 1992 the result of joint operations in the widespread and systematic attack against the civilian population of villages and settlements inhabited by the Muslim population was the killing of at least 500 civilians, men, women and children, and unlawful imprisonment of several thousand men fit for military service, out of whom more than 1000 were transported to the camps *Stara Gradiška* and *Manjača*.

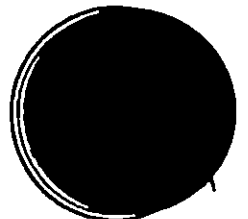
The cooperation between the army and the police and "results" of their activities were best described by the following sentences of the Chief, suspect Vinko Kondić: "... we cooperated very successfully with army members, especially with the military security body. We planned and carried out most operations together..... we successfully coordinated members of the reserve police forces and assigned almost 50% of them to military units...."

With a view to coordinating those operations in the area of the municipality, on 31 May 1992 the Commander of the 30th Division established the Ključ Defense Command, which brought together all military units engaged in combat operations, as well as all units of the Public Security Station. The basic task set by the Ključ Defense Command was the protection of the Serb people in the wider area of the municipality. "The Ključ battalion of the public security forces" was also within the units which were responsible for carrying out the tasks. It was a special reserve maneuver unit of the Ključ Public Security Station, which in February 1992 was sent to the Training Centre on Manjača for special training given by military instructors. The training was also attended by a small number of non-Serb police officers who were allowed to watch, but not to take active part in the training. Already in late April 1992 the unit was sent to assist Gojko Kličković in the creation of the Serb Municipality of Bosanska Krupa and the takeover of authority by Serbs.

The first order issued by the Commander Drago Samardžija on 25 June 1992 referred to a joint operation with the 6th Infantry Battalion under the command of Branko Basara, based in the area of the neighboring town of Sanski Most, which related to a complete blockade, search and mopping up of the terrain of Ramići, Krasulje, Hripavci and Ošiljak, which were inhabited by the Muslim population.

During the operation, the brigade security body, together with a detachment of the Public Security Station, established a checkpoint in the school area in Ramići, where those who were arrested were received, processed, and then transferred to the Public Security Station or the primary school *Nikola Mačkić* Ključ for further investigation.

The second order issued on 9 July 1992 referred to a complete blockade, search and mopping up of terrain of the sector covering the villages of Donji Biljani, Domazeti, Botojčići, Jakubovac and Brkići. In accordance with the order, the 2nd Battalion of the 17th Light Infantry Brigade was reinforced by a reconnaissance platoon, military police detachment and police platoon. The special task of the Sanica police detachment was to move along the route Sanica-Jakubovac-Donji Biljani and to establish a checkpoint in the sector of Donji Biljani school for the processing of suspicious persons. The extreme cases were to be transported to the Public Security Station in Ključ for further processing.



This and other evidence collected during the investigation show that the Public Security Station in Ključ was used as a collection center for arrested and detained persons who were interrogated and then sent to the camps in Stara Gradiška and on Manjača. The other location which was used as a detention facility in the town itself was the primary school *Nikola Mačkić*, which is located in the immediate vicinity of the Public Security Station building, where detainees were interrogated and guarded by the army and the police.

The Chief of the Security Services Centre, Stojan Župljanin, issued an order that public security stations which transported captives to Manjača should open a file on each prisoner in order to decide which further measures should be taken. In accordance with this, the suspect Vinko Kondić sent to the military camp *Manjača* investigators of the Ključ Public Security Station who interrogated the detainees inside the military camp. In addition to the army, a maneuver police unit of the Ključ Public Security Station also provided security of the *Manjača* camp.

Dispatches of the Chief of the Security Services Centre, Stojan Župljanin, and the order on the use of the police forces issued by the Major General Talić clearly show that the army attacked Muslim villages in coordination with the police, that the police received operative instructions from military officers, but they were under the direct command of their relevant personnel from the Ministry. According to an order issued by the then Minister of Internal Affairs, Mićo Stanišić, police units could receive orders only from the Minister of Internal Affairs, the Commander of the police of the Ministry of the Interior and the Chief of the Security Services Centre.

A great amount of evidence confirms that the army, the Territorial Defense, and the Ključ Battalion, were engaged in all activities of mopping up, surrounding of villages and settlements inhabited by the Muslim population, capture, physical and mental abuse in detention facilities and deportation from the area of the municipality.

There is evidence which clearly points to the conclusion that only the police participated in some mass and individual killings and taking away of people who disappeared without a trace, but there is also evidence that only the army participated in the commission of those offences, such as the attack on the village of Prhovo, where the entire population was expelled from their houses, then the men were separated from the women and children and, along with beatings and killings, a certain number of men who were found there were taken in the direction of the village of Peći, while the women and children who remained in the village were fired at from fire weapons, on which occasion more than 30 of them were killed. The regular and reserve police forces continued hunting down the men who survived "the mopping up" of their village, Prhovo, and then applied the standard and already

established methods of processing and deciding about transportation to camps or release to those who were caught.

In addition to being marked by the population movement, war operations carried out by the army and the police were also noticeable for considerable destructions during the attacks and high level of looting after the attacks. The then military and police reports clearly made it known that the level of destruction and burning of buildings was high. There is evidence that the army was involved in looting and that this problem was very well known to the military command.

Individual responsibility of the suspects Boško Lukić and Marko Adamović

A number of people participated in the joint criminal enterprise during different periods of time, starting from the second half of 1991. Every participant and co-perpetrator in the joint criminal enterprise played his role or several roles which significantly contributed to the overall objective of the enterprise. In addition to the suspects, the following individuals were among those who participated in the joint criminal enterprise in the area of the Ključ Municipality: Vinko Kondić, Veljko Kondić, Gojko Đukić, Jovo Malbaša, Rajko Kalabić, Ljuban Bajić, Drago Samardžija and other hierarchically superior members of the ARK Crisis Staff, such as Radoslav Brđanin, President of the ARK, Stojan Župljanin, Chief of the Banja Luka Security Services Centre, Bogdan Subotić, Commander of the Republic TO Staff, all up to the top leadership of the Assembly of the Serb People, including Momčilo Krajišnik, Ratko Mladić and other known and unknown members of the JNA, the TO and the police, politicians, and members of other military and civilian structures.

The suspect Boško Lukić took part in the activities of the Ključ SDS very early, which corroborates his active role in the implementation of the Instructions of 19 December 1991 and supports the conclusion that not only did he share the policy of creating a separate Bosnian Serb state with the leadership of Bosnian Serbs and not only did he know that that policy could only be implemented by the use of force and fear, but that from the very beginning he was also one of the participants in the implementation of this policy in the territory of the Ključ Municipality.

Although he did not take an active part in the SDS early, Marko Adamović, as an SDS activist, still managed to secure one of the key roles in the Territorial Defense, which would lead him to the position of a member of the Municipal Crisis Staff and the Commander of the Town Defense Command, and in these positions, with full knowledge, he accepted and started implementing the Instructions of 19 December 1991 and all conclusions and decisions made at joint meetings of a group of top officials of the police, military and municipal authorities, whereby he

knowingly joined others in the realization of the joint criminal enterprise, which aimed at the implementation of the objectives of the Strategic Plan of the Assembly of the Serb People in BiH in order to create a state of the Serb people along with the elimination and permanent removal of non-Serbs from the territory of the municipality.

Numerous individuals in the Municipality of Ključ participated in the joint criminal enterprise; their plan got its formal outline in the text of the Declaration on the Proclamation of the Serb Republic of Bosnia and Herzegovina, dated 9 January 1992, which was adopted by the SDS Main Board. On the basis of this Declaration, the Instructions for the Organization and Activity of the Serb People in BiH in Extraordinary Circumstances of 19 December 1991 were adopted and they prescribed the manner of carrying out activities in Serb-populated municipalities and the manner of establishing crisis staffs, which would serve as a legal basis for the establishment of the Ključ Municipality Crisis Staff and making a decision to join the Autonomous Region of Krajina, and the issuance of the Order to establish local boards, the Order for the mobilization and seizure of weapons from the Muslim population, the prohibition to enter and exit the Ključ Municipality, and the Order for further activities with combat disposition.

The suspects Boško Lukić and Marko Adamović knowingly and independently undertook activities and joined an organized group in order to carry out a joint criminal enterprise. In accordance with the positions they held, they participated in and were present during the planning and issuance of orders, instructions, decisions and other regulations relating to carrying out, planning, participating, ordering, instigating or aiding and abetting in the planning, preparation or execution of the persecution of the non-Serb population on political, national, ethnic, cultural and religious grounds. The realization of the joint criminal enterprise began with the planning and preparation for the takeover of power, and then followed the takeover of power by Serb forces in villages and settlements of the Ključ Municipality in a widespread and systematic attack against the civilian population, which resulted in unlawful arrests, deprivation of liberty or imprisonment of civilians based on discrimination, beatings, torture, imprisonment in inhumane conditions, forcible transfer and deportation from their homes and villages by the use of force, intimidation and coercion.

The suspects Boško Lukić and Marko Adamović indisputably bear individual responsibility as members of a group organized for the perpetration of criminal offenses prohibited under international humanitarian law and responsibility for prohibited acts which were committed as part of the joint criminal enterprise. They were accomplices, aiders and abettors and inciters in the joint criminal enterprise.

Crimes brought against the suspects in the operative part of this Indictment are part of objectives of the joint criminal enterprise. The suspects Adamović, Lukić and

other members of the joint criminal enterprise had a mutual understanding or agreement that they would commit crimes brought against them and acted with the state of mind necessary for the commission of each of those crimes. In addition, every member of the Crisis Staff, War Presidency and the SDS Executive Committee was aware that his conduct was in the context of the armed conflict and that it was part of a widespread and systematic attack against the civilian population, which was based on discrimination.

The suspects Lukić and Adamović were aware of the system of abuse through which the territory of the Ključ Municipality was "ethnically cleansed" and its non-Serb inhabitants were systematically killed, maltreated and forcibly removed or deported, they intended to facilitate this system and took no effective measures to prevent or stop the abuse or punish the perpetrators of those offenses. It can be unequivocally concluded from the foregoing that they knowingly participated in the systems of abuse with the intention to reinforce these systems.

The suspect Boško Lukić, on the grounds of his position as the Commander of the TO Staff, and the suspect Marko Adamović, on the grounds of his position as the Commander of the Town Defense Command, with the authorities of a superior, are also responsible for the acts and omissions of their subordinates. They knew that their subordinates could commit the crimes stated in the operative part of the Indictment or that they had been committed, but they failed to take the necessary and reasonable measures to prevent such acts or to punish the perpetrators thereof. Their role included the obligation to investigate and establish facts of the crime, which they did not even attempt to do.

The investigation results unequivocally lead to the conclusion that the suspect Boško Lukić and the suspect Marko Adamović, as members of a group in the joint criminal enterprise, committed the criminal offenses charged against them in this Indictment, in the manner as described in the operative part of the Indictment.

Material which corroborates the Indictment

1. Record of the questioning of the suspect Boško Lukić, number KT-RZ-119/05, dated 20 March 2008
2. Record of the questioning of the suspect Boško Lukić, number KT-RZ-119/05, dated 21 March 2008
3. Record of the questioning of the suspect Marko Adamović, number KT-RZ-119/05, dated 20 March 2008

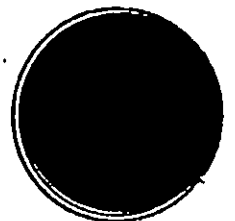


4. Record of the questioning of the suspect Marko Adamović, number KT-RZ-119/05, dated 21 March 2008
5. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 8 April 2008
6. Record of the examination of Witness C, number KT-RZ-119/05, dated 8 April 2008
7. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 23 May 2008
8. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 9 April 2008
9. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 11 April 2008
10. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 10 April 2008
11. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 10 April 2008
12. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 9 April 2008
13. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 9 April 2008
14. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 26 May 2008
15. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 9 April 2008
16. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 8 April 2008
17. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 8 April 2008
18. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 12 May 2008
19. Record of the examination of the witness [REDACTED] number KT-RZ-122/05, dated 14 April 2006
20. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 23 May 2008
21. Record of the examination of Witness A, number KT-RZ-119/05, dated 3 April 2007
22. Records of the examination of Witness B, number KT-RZ-119/05, dated 27 December 2007 and KT-RZ-4/05, dated 11 July 2005
23. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 2 April 2007

24. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 29 January 2008
25. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 4 February 2008
26. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 5 February 2008
27. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 31 January 2008 and KT-RZ-4/05, dated 15 July 2005
28. Records of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 25 December 2007 and number KT 160/97-RZ, dated 11 May 2005
29. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 24 December 2007 and KT-RZ-4/05, dated 11 July 2005
30. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 7 February 2008
31. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 11 February 2008
32. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 29 January 2008
33. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 24 January 2008
34. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 12 February 2008
35. Records of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 24 January 2008 and number 17-11/3-04-2-126/06, dated 5 April 2006
36. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 23 January 2008
37. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 27 December 2007
38. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 4 February 2008
39. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 25 February 2008
40. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 31 January 2008
41. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 22 January 2008
42. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 22 January 2008

43. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 27 December 2007
44. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 26 December 2007
45. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 28 December 2007
46. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 26 December 2007
47. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 26 December 2007
48. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 24 December 2007
49. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 26 December 2007
50. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 27 December 2007
51. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 25 December 2007
52. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 18 December 2007
53. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 25 December 2007
54. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 25 December 2007
55. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 17 December 2007
56. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 17 December 2007
57. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 30 November 2007
58. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 30 November 2007
59. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 5 December 2007
60. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 23 November 2007
61. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 24 December 2007
62. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 21 November 2007

63. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 21 November 2007
64. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 21 November 2007
65. Record of the examination of the witness [REDACTED] number 05-1/08-1-145/08, dated 22 February 2008
66. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 7 June 2007 and KT-RZ-122/05, dated 30 March 2006
67. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 30 November 2007
68. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 3 December 2007
69. Record of the examination of the witness [REDACTED] number 05-1/08-3-236/08, dated 20 February 2008
70. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 3 April 2007
71. Record of the examination of the witness [REDACTED], number 05-1/08-1-144/08, dated 22 February 2008
72. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 6 April 2007
73. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 4 June 2007
74. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 4 June 2007
75. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 8 June 2007
76. Record of the examination of the witness [REDACTED], number KT-RZ-119/05, dated 7 June 2007
77. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 1 April 2007
78. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 5 April 2007
79. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 4 December 2007
80. Record of the examination of the witness [REDACTED] number KT-RZ-119/05 4 December 2007
81. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 5 December 2007
82. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 18 December 2007



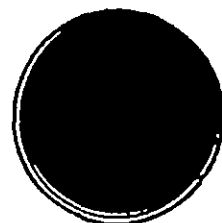
83. Record of the examination of the witness [redacted] number KT-RZ-119/05, dated 5 April 2007
84. Record of the examination of the witness [redacted] number KT-RZ-119/05, dated 3 December 2007
85. Record of the examination of the witness [redacted] number KT-RZ-119/05, dated 4 December 2007
86. Record of the examination of the witness [redacted] number KT-RZ-119/05, dated 4 December 2007
87. Record of the examination of the witness [redacted] number KT-RZ-119/05, dated 5 December 2007
88. Record of the examination of the witness [redacted] number 05-1/8-1-682/07, dated 8 December 2007
89. Record of the examination of the witness [redacted] number KT-RZ-119/05, dated 24 December 2007
90. Record of the examination of the witness [redacted] number KT-RZ-119/05, dated 24 December 2007
91. Record of the examination of the witness [redacted] number KT-RZ-119/05, dated 3 December 2007.
92. Record of the examination of the witness [redacted] number KT-RZ-119/05, dated 3 December 2007
93. Record of the examination of the witness [redacted] number KT-RZ-119/05, dated 5 December 2007
94. Record of the examination of the witness [redacted] number KT-RZ-119/05, dated 29 February 2008
95. Record of the examination of the witness [redacted] number KT-RZ-122/05, dated 29 March 2006
96. Record of the examination of the witness [redacted] number KT-RZ-122/05, dated 13 April 2006
97. Record of the examination of the witness [redacted] number KT-RZ-122/05, dated 31 March 2006
98. Record of the examination of the witness [redacted] number KT-RZ-119/05, dated 2 April 2007
99. Record of the examination of the witness [redacted] number KT-RZ-122/05, dated 31 March 2006
100. Record of the examination of the witness [redacted] number KT-RZ-119/05, dated 4 April 2007
101. Record of the examination of the witness [redacted] number KT-RZ-122/05, dated 30 March 2006
102. Record of the examination of the witness [redacted] number KT-RZ-119/05, dated 22 November 2007

103. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 1 April 2007
104. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 3 April 2007
105. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 4 April 2007
106. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 22 November 2007
107. Record of the examination of the witness [REDACTED] number KT-RZ-119/05, dated 21 December 2007
108. Record of the examination of the witness [REDACTED] number KT-RZ-122/05, dated 12 April 2006
109. Record of the examination of the witness [REDACTED] number KT-RZ-122/05, dated 31 March 2006
110. Record of the examination of the witness [REDACTED] number KT-RZ-122/05, dated 29 March 2006
111. Record of the examination of the witness [REDACTED] number 05-1/08-1-320/08, dated 10 August 2008

Motion to extend custody

The Prosecutor's Office of BiH hereby proposes the extension of custody of the suspects Boško Lukić and Marko Adamović pursuant to Article 137(1) for the reasons set forth under Article 132(1)(a) and (b) of the CPC BiH.

The investigation results and obtained evidence confirm the existence of grounded suspicion that the suspects Boško Lukić and Marko Adamović committed the criminal offense of Organizing a Group of People and Instigating the Perpetration of Genocide, Crimes against Humanity and War Crimes in violation of Article 176(2) in conjunction with paragraphs (1) and (4) of the same Article of the CC BiH, the criminal offense of Crimes against Humanity in violation of Article 172(1)(h) in conjunction with items (a), (b), (d), (e), (f), (i) and (k), the criminal offense of Violating the Laws and Practices of Warfare in violation of Article 179(1) in conjunction with paragraph (2)(b) and (e), all in conjunction with Article 176(2) in conjunction with paragraphs (1) and (4) of the same Article of the CC BiH, in conjunction with Article 180(1) and (2) of the CC BiH and in conjunction with Article 53 of the Criminal Code of Bosnia and Herzegovina.



Under the Decision of the Court of Bosnia and Herzegovina number X-KRN-05/119, dated 21 March 2008, the suspects Boško Lukić and Marko Adamović were ordered into custody pursuant to Article 132(1)(a) and (b) for a term of one (1) month, which was extended under the Decision number X-KRN-05/119, dated 18 April 2008, for another month. On 14 May 2008, the Prosecutor's Office of BiH submitted the Motion to extend custody of the suspects Boško Lukić and Marko Adamović for another month pursuant to Article 135(2) in conjunction with Article 132(1)(a), (b) and (d) of the CPC BiH, whereupon the Court, under the Decision number X-KRN-05/119, extended custody of the suspects for another month to last until 16 June 2008 or pending a new decision of the Court.

The reasons and grounds to extend custody after the confirmation of the Indictment which existed at the time when initially ordering custody still exist. In addition, taking into consideration the stage of these criminal proceedings, all custody grounds have been intensified.

The fact that the risk of flight exists has just taken on a new significance. Although they are currently in custody, given the present course of the proceedings, the suspects have a stronger motive to go into hiding and escape from the judicial bodies of BiH after they faced very serious charges brought against them in this Indictment. Bringing this motive into connection with the already established circumstances that the suspects are registered at fictitious addresses and that there is a realistic risk that they can cross the border and go into hiding in the territory of another state, it follows that the risk of flight has taken on a new significance.

The Prosecutor's Office of BiH also considers that it is still justified to fear that the suspects, if released, might hinder the criminal proceedings by influencing witnesses, accomplices and aiders and abettors, which the Prosecutor's Office elaborated on in its motions to order and extend custody. The Prosecutor's Office notes that this risk still exists since the witnesses who have already been examined by the Prosecutor's Office of BiH might be influenced to change their statements to be given before the Court of BiH at the main trial. The fact that the witnesses already gave their statements in the investigation is relevant; however, it should be noted that the Verdict is primarily based on the evidence presented at the main trial.

Some witnesses were examined before the ICTY, they had protective measures, and in their statements given in the Prosecutor's Office they noted that they felt fear and insecurity, which is intensified because of their testifying before the ICTY. All the above may realistically influence their testifying before the Court of BiH and possibly frustrate their testimonies.

In the relevant period, at the time of the commission of the criminal offences charged against them in the Indictment, the suspects Boško Lukić and Marko Adamović had a number of co-perpetrators, aiders and abettors and inciters, including Veljko Kondić, a political leader, [REDACTED] against whom the Prosecutor's Office is conducting an investigation and who are at liberty, as well as Stojan Župljanin, Chief of the Banja Luka Public Security Services Centre, who is currently on the run, trying to avoid prosecution before the International Criminal Tribunal for the Former Yugoslavia in the Hague, one of the close associates of the suspects in the relevant period and also a member of the Crisis Staff of the Ključ Municipality, [REDACTED] with whom the suspect Boško Lukić has already attempted to establish contact, namely by requesting to contact him in the prison.

If released, the suspects could certainly get in touch with the accomplices, accessories and aiders and abettors and cooperate with them. It unambiguously follows from the Indictment that the suspects Boško Lukić and Marko Adamović are only a part of the system in the implementation of the planned objectives and the then issued Strategic Plan. The awareness of the creators and direct participants in the planning, preparing, ordering and perpetrating the criminal offences resulting from those actions also follows from the Indictment, which means that such co-perpetrators and accessories, inciters and aiders and abettors would certainly wish to avoid the criminal prosecution also by influencing the course of this criminal proceeding.

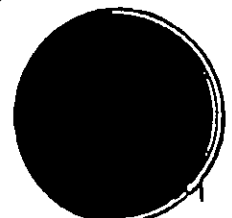
The Prosecutor's Office of BiH holds that these circumstances fully justify the fear that the suspects would have an obvious motive to use the time to communicate, which would hinder the further course of the criminal proceedings.

The risk of falsifying the evidence or clues important to the criminal proceedings is corroborated by the fact that the suspects registered false places of residence.

For all the foregoing reasons, the Prosecutor's Office of BiH proposes that the custody of the suspects Boško Lukić and Marko Adamović be extended for the reasons referred to in Article 132(1)(a) and (b) of the CPC BiH.

PROSECUTOR
PROSECUTOR'S OFFICE OF BIH

Džemila Begović
/Stamp and signature affixed/



I hereby confirm that this document is a true translation of the original written in Bosnian/Serbian/Croatian.

Sarajevo, 04.07.2008

Certified Court Interpreter

