

**OFFICE OF THE COUNTY PUBLIC PROSECUTOR  
IN ZAGREB**

Number: DO-K-141/98  
Zagreb, July 8, 1999

**TO THE COUNTY COURT IN ZAGREB**

Re.No.: K-242/98

In the criminal case against Dinko Ljubomir Sakic for the criminal offence referred to in Article 120, paragraph 1 of the Basic Criminal Code of the Republic of Croatia and pursuant to the provision of Article 341, paragraph 1 of the Criminal Procedure Act, I hereby amend the factual description of the criminal offence to read:

In the events of World War II, when, pursuant to the implementation of Nazi and racial laws and legal provisions against political opponents, between 1941 and 1945 in the territory of the "Independent State of Croatia", tens of thousands of civilians, mostly Jews, Roma, Serbs and Croats were abused, tortured and killed, after (from February 1942 to April 1944) as a member of the "Ustasha Defence" in the headquarters of the camps Stara Gradiska and Jasenovac, the defendant discharged various duties. From April to November 1944, as the commander of the Jasenovac Camp, contrary to the principles and provisions of Articles 46 and 50 of the Convention (IV) on the Laws and Customs of War on Land (1907) and while commanding the camp and performing other tasks of administrating, making and enforcing decisions, he abused, tortured and killed the internees by personally issuing orders and participating in their implementation and at the same time by not undertaking anything to prevent the directly subordinated members of the "Ustasha Defence" from doing the same, so that:

- the inmates were subjected to excessively hard physical labour, starvation due to bad and insufficient food, physical and mental abuse which led to severe illnesses and then, in the case of undetermined numbers of internees, also to death,

- ill and for labour unfit internees who, in undetermined numbers, were taken from the camp hospital and their huts or singled out from the so-called "musters" and executed, together with other internees who, from time to time and on the basis of previously made lists, more frequently in the autumn of 1944, were singled out at night from huts and other quarters and executed mostly at "Gradina" in significant but undetermined numbers,

- individuals and groups of internees taken to the facility called "Zvonara" in which, during an "investigation" they were tortured and abused to death,

- some Ustasha officers, NCO's and military personnel, subordinated to the defendant, without any motive abused and killed the internees because of the alleged attempts to escape, because of not working hard enough and because of other "offences" or simply wantonly. On an unspecified day at the end of September or the beginning of October 1944, the defendant personally shot an internee because he had stolen a corn cob. In addition, on an unspecified day, while being a commander of the camp, the defendant participated, together with other Ustasha officials, in the shooting from a window of the headquarters at internees in the so-called "hunting game", thus causing death of undetermined number of internees,

- because of a system of individual and collective punishments for the alleged violations and in order to deter other internees by the so-called "camp musters" or "musters" within separate working groups, several internees were singled out and then killed before

the "musters" and at the execution sites of the camp - Granik, Gradina and others. In such a way, on several occasions individuals and groups of internees were liquidated in undetermined numbers. Some of them were left hanging from the posts in the camp for days, among them the internees Albert Izrael and a cap-maker by the surname Nisim,

- on the occasion of the alleged escape of the internee Ivo Volner, from a "muster" of internees, 20 internees were singled out, mostly Jews and members of the "musical group", who were taken to "Zvonara" and then executed, while the accused personally, in front of the internees, shot with his pistol the internees Avram Montiljo and Leon Perer,

- on September 21, 1944, in front of the "camp muster", he ordered hanging of about 20 internees and among them were hanged Ramzija Rebac, Ladislav Matej, Musafija Heinrich, engineer Boskovic D Mitar, Nikola Pejnovic, Branko Vojnovic, Stevan Zivkovic, Boro Sekulic and Pero Krajnovic, while he personally shot Dr. Mile Boskovic with his pistol,

- in the period from August to October 1944 at Granik and Gradina he ordered the liquidation of several groups of civilians brought to the Jasenovac camp from different parts of the "NDH" and in such a way several hundreds of persons were killed.

The legal description of the criminal offence and the legal qualification remain unchanged.

**COUNTY PUBLIC PROSECUTOR**  
**Radovan Santek**