



Republic of Serbia
OFFICE OF THE WAR CRIMES
PROSECUTOR

Belgrade, 9 November 2007

DISTRICT COURT IN BELGRADE
- *War Crimes Chamber* -

Belgrade

Pursuant to my authority under articles 46 §2 (3) and 266 of the Criminal Procedure Act re articles 3 and 4 §2 of the Law on Organisation and Competence of State Authorities in War Crimes Procedure, I hereby bring the

INDICTMENT

Against Ilija JURIŠIĆ, from Tuzla, married and father of two majors; trained schoolteacher and philosophy graduate, now retired police officer formerly serving at the BH Ministry of the Interior (MUP); underwent compulsory army training in Bileća (BH), at a school for reserve officers; holds dual citizenship in Bosnia-Herzegovina and in Croatia; awarded the national decoration for merit and the city of Tuzla golden plaque; no criminal record; currently in detention further to the rulings K.i.V. 3/04 of 11 May 2007, and Kr.r.z. 2/07 of 9 August 2007, rendered by the War Crimes Chamber and the Serbian Supreme Court respectively.

Background

At the time relevant to this indictment, armed conflicts existed in the territory of Bosnia-Herzegovina (BH), one of the republics which then constituted the Socialist Federal Republic of Yugoslavia (SFRJ). Alongside mutual clashes between armed structures of local Bosniac, Croatian and Serbian ethnic groups, the conflicts involved Bosniac and Croatian armed forces fighting against the Yugoslav People's Army (JNA), wherein the accused, Ilija JURIŠIĆ, engaged as described below.

On 27 April 1992, the BH Republic's Presidency rendered the decision (ref. no. 02-11-327/92) on peaceful departure of JNA forces from BH, thereby confirming a previous agreement between BH and the FRJ (the Federal Republic of Yugoslavia, i.e. the state union of the former SFRJ republics), further to which the JNA forces were guaranteed a safe removal from the BH territory and their withdrawal into the FRJ territory.

Further to the aforementioned agreement, which had been reached between the Tuzla civilian and military authorities and Colonel Milo Dubajić, commander of the Tuzla-based JNA military compound, the 92 motorised brigade was due to leave the barracks and move in a marching column along the determined route from the barracks, leading through Skojevska Street up to Brčanska Malta junction and onward to Bijeljina. The same agreement also provided guarantees that the JNA column would not be attacked in the course of withdrawal.

Charges

In his capacity as official commander of the operational group known as operational staff, which had been formed within the local public security centre, Ilija JURIŠIĆ was the order-issuing authority in control of all armed formations deployed over the territory of Tuzla. On 15 May 1992, acting in breach of the guarantees provided by the foregoing agreement whereof he was fully aware, JURIŠIĆ personally ordered the attack on the JNA column. At around 19:00 hrs. of the above specified day, according to a premeditated and perfidious attack plan previously devised by the Tuzla municipal presidency's crisis staff, JURIŠIĆ was on duty at the operational staff, part of the Tuzla public security centre. Upon orders received from his superior Mehmed BAJRIĆ aka Mešo, at the time head of the local public security centre, Ilija JURIŠIĆ contacted via radio links the territorial defence staff, the so-called Patriotic League and public security services, whose members, according to a previous plan, were in a state of combat readiness and positioned inside the surrounding buildings, along the streets and behind improvised shelters that had been laid out on the JNA withdrawal route. Once through, JURIŠIĆ ordered the deployed troops to open fire from all weapons available at the central part of the column as it was, pursuant to the BH Presidency's decision and the existing agreement, peacefully moving through Skojevska Street and Brčanska Malta junction. Upon JURIŠIĆ's orders, snipers opened fire from their positions and first killed the drivers of the army vehicles. As a result, the vehicles stopped moving, thereby blocking the column's further movement along the previously specified withdrawal route. The next to come under the snipers' fire were the soldiers on board the halted vehicles, who were not prepared to fight or offer resistance. Attacked in the final bout were the visibly and appropriately marked military ambulances, which resulted in the deaths of several military medical staff.

The above described attacks caused the deaths of at least 92 JNA members, whose names and other known details - their fathers' names in parentheses, places and dates of birth - are set forth below:

Božanović, Risto (Anđelko)
Blagojević, Vojo (Simo), Bosansko Petrovo Selo, 10/10/59
Blagojević, Vojo (Drago), Lopari, 16/02/49
Bogdanović, Vladimir (Pero)
Božić, Miroslav (Danilo)
Božić, Gordan (Ilija), Komari (Lukavac), 23/11/64
Vasić, Duško (Živan)
Vasić, Jovo (Nenad), Tuzla, 10/03/53
Vujanović, Cvijetin (Ljubomir), Požarnica, 17/06/66
Vukojević, Savo (Anđelko), Lukavac, 20/01/65
Gavrilović, Pero (Radivoje), Crno Blato

Gavrić, Žarko (Jovan), Krtovo
Gajić, Nenad
Godanović, Krsta (Žarko), Sižje
Goganović, Vaskrsije (Žarko), Lukavac, 02/05/37
Davidović, Božo (Nikola), Viduša (Kakanj), 07/01/73
Dangubić, Željko
Despotović, Slavko (Petar), Bosansko Petrovo Selo
Đokić, Jovan
Đumić, Milanko (Dmitar), Petrovac, 1942
Đumić, Dragan
Đuranović, Robert (Savo), Komari (Lukavac)
Đurić, Rade (Dušan), Dubnica
Đurić, Rajko (Dušan), Dubnica
Đurić, Živko (Ilija), Crno Blato, 04/07/68
Đurić, Zoran (Marko), Crno Blato, 05/07/61
Đurić, Milenko (Marko), Crno Blato, 25/03/63
Đurić, Marko (Milan), Crno Blato, 23/02/36
Đurić, Živko (Marko), Crno Blato
Živković, Triško
Zec, Draženko (Branislav), Prijedor
Ikić, Miro (Cvijetin), Dubnica
Ikić, Pero (Cvijetin)
Ilić, Vlado (Stevo), Tinja (Srebrenik), 09/10/52
Ilić, Boško (Radovan), Brijesnica (Lukavac), 08/07/70
Janjić, Drago (Ljubo), Kolimer (Tuzla), 10/10/56,
Jeftić, Maksim
Jović, Milenko, Lopari
Jovanović, Duško (Živan), Požarnica, 07/05/73
Jovičić, Miroslav (Milorad), Puračići (Lukavac), 22/04/68
Jokić, Goran (Niko), Offenbach (Germany), 08/11/72
Josipović, Mladen (Krst), Lukavac, 27/07/65
Jurković, Zoran (Marko), Tuzla, 24/11/62
Kulišić, Milan (Vaso), Sižje (Lukavac), 12/04/46
Lazić, Ranko (Jovan), Tuzla, 29/09/73
Latković, Slobodan (Marko), Petrovac, 19/08/73
Lopatko, Miroslav (Danilo), Prnjavor, 29/09/72
Lukić, Savo (Milorad), Dubnica
Lukić, Ilija (Milan), Krtovo (Lukavac), 28/06/64
Ljubojević, Đorđije (Stanimir), Kovačica (Tuzla), 02/09/62
Maksimović, Jovo (Milan), Dubnica
Marković, Stojko (Cvijetin), Vozuća (Zavidovići), 26/03/62
Marković, Ranko, Vozuća (Zavidovići)
Mekić, Dragan (Milenko), Zemun, 08/09/59
Mekić, Zoran
Mićanović, Vladimir (Mića), Tuzla, 29/08/68
Mitrović, Srpko (Simo), Dubnica
Mihajlović, Zoran (Radovan), Bosansko Petrovo Selo
Mihajlović, Milan (Radovan), Bosansko Petrovo Selo
Modraković, Radovan (Tripun), Krivača (Živinice)
Modraković, Radivoje, Živinice
Modraković, Radomir

Mrkonjić, Branko (Ranko), Smoluća (Lukavac)
Mrkonjić, Ranko (Ranko), Sižje, 17/05/48
Mrkonjić, Stojan, Lukavac
Milošević, FNU, Požarevac
Nedić, Milan (Vaskrsije), Sižje, 16/02/56
Nedić, Rado (Nedo), Smoluća, 13/08/55
Negić, Dragan
Ostojić, Milorad (Janko), Potpeća (Srebrenik), 21/05/54
Panić, Branislav, Ilijaš
Perić, Ostoja (Đorđije), Smoluća, 18/02/69
Petrović, Boro (Sretko), Krtovo, 03/06/71
Popović, Neđo (Radivoje), Kalesija, 29/11/54
Savić, Milenko (Branko), Požarnica, 13/10/59
Sorajić, Božidar (Branko), Ljubinja, 10/12/73
Stojanović, Branko, Dubnica
Stojanović, Sreten (Branko), Dubnica (Kalesija), 1955
Stojanović, Čedo (Vasilije), Dubnica (Tuzla)
Tadić, Boro (Milorad), Krtovo, 25/04/64
Todić, Rade (Jovo), Srebrenik, 03/10/70
Todorović, Dragan (Dušan), Krtovo, 07/02/64
Todorović, Radomir (Luka), Krtovo, 23/09/54
Todorović, Vojko (Mitar), Požarnica, 31/01/43
Trifunović, Milovan (Cvijetin), Špionica (Srebrenik)
Tubić, Stevo (Stojan)
Tubić, Milorad (Janko), Brijesnica
Tubić, Jelenko (Jovan), Sižje, 22/04/53
Cvjetković, Živorad (Milan), Smoluća, 1970
Cvjetković, Danilo (Mirko), Potpeće (Srebrenik), 1972
Cvjetković, Zoran, Belgrade
Džolić, Jovan (Niko), Jajce, 07/07/71.

In addition to the foregoing deaths, the attacks on the JNA column, which had been ordered by the herein accused Ilija JURISIĆ, caused the wounding of at least 33 JNA members, namely:

Babunović, Cvijan (Ilija), Bijeljina
Vukojević, Zoran (Anđelko), Krtovo
Vukumirica, Miodrag (Jovan), Belgrade
Dragić, Nenad (Ilija), Zvornik
Đurić, Boro (Branko), Vasilevac
Ilić, Goran (Stevo), Vranjevo
Josipović, Dobroslav (Dušan), Sižje
Jović, Branko (Dušan), Bijeljina
Krstić, Radovan (Simo), Bijeljina
Kulišić, Branislav (Cvijetin), Doboj
Kulišić, Tatomir (Dragomir), Sižje
Lukić, Mirko (Pero), Sižje
Ljubojević, Blagoje (Đorđe), Bijeljina
Marjanović, Goran
Marković, Zoran (Savo), Krtovo
Mandić, Tomislav (Dragoljub), Belgrade

Mihajlović, Vojislav (Miloš), Krtovo
Mihajlović, Danko (Miloš), Sižje
Mrkonjić, Ratko (Mladen), Sižje
Novaković, Slavko (Novak), Janja
Pantić, Stojan (Jovan), Bijeljina
Pajkić, Rade (Žarko), Mičijevići
Pajić, Ljubo (Stanimir), Bijeljina
Radić, Slobodan (Petar), Krtovo
Sarafijanović, Željko (Miloš), Stupari
Sarafijanović, Milutin (Vojislav), Krtovo
Stevanović, Radan (Čedomir), Bijeljina
Simić, Branko (Ratko), Sižje
Todorović, Zoran (Dušan), Krtovo
Todorović, Ozrenko (Vojislav), Krtovo
Tešić, Ljubo (Nenad), Bijeljina
Tripunović, Vidak (Stojan), Stupari and
Ćosić, Miladin (Dušan), Stupari.

In addition to the foregoing, the attacks ordered by JURIŠIĆ resulted in the destruction of a considerable number of military vehicles and ambulances.

By his participation in the above described event, the accused, Ilija JURIŠIĆ, **committed the criminal offence recognised by article 148 (2) re (1) (use of impermissible means of combat) of the SFRJ Criminal Code.**

Moreover, the attack orders issued by JURIŠIĆ constitute impermissible methods of combat that are incriminated by international law, namely by the following international agreements:

Geneva Convention I of 12 August 1949, specifically its article 19, which governs the status and treatment of the sick and wounded military personnel in wartime; this Convention was ratified by the then Federal People's Republic of Yugoslavia - FNRJ (*The FNRJ Official Gazette* no. 24/50);

Additional Protocol to the Geneva Conventions of 12 Aug. 1949 (Protocol I), specifically its articles 21 and 37 (1), which govern the protection of victims in international military conflicts.

In view of the foregoing breaches, I PROPOSE that a public trial be scheduled and held before the War Crimes Chamber of the District Court in Belgrade, whereto the following parties be summoned:

- 1 War Crimes Prosecutor from Belgrade
- 2 Injured parties
- 3 Accused Ilija JURIŠIĆ
- 4 Defence counsel for the accused
- 5 Witnesses.

I further propose that, in the course of the trial session, the following documents be read out:

- Statements provided by the injured parties and witnesses
- Written documents and decisions
- Records on identification of victims' remains
- Records on exhumation done at the infant cemetery Trnovac in Tuzla, which was conducted by the Bijeljina district prosecution authority in the period between 7 and 30 April 2004
- Rulings, identification lists and death certificates for the killed
- List of the JNA personnel - members of the Tuzla-based military compound 7954, who were killed in Skojevska Street in Tuzla on 15 May 1992 (while the origin of this document, marked I-1529 and dated 7 February 2001, is not known, it offers relevant details of the victims - item 1 of this document lists the names and addresses of the killed, and 1a those of the wounded); the report ref. 02 165/96-2 of 13 March 1996, issued by the committee in charge of collecting evidence on war crimes against humanity and international law, which contains the list of the killed; photocopy of the letter which refers to the killing of Nenad Gajić.

In addition to the above, insight should be made into the following documents:

- Sketch map of the crime scene with marked direction of the marching column's movement through Tuzla, drawn on 6 July 2001 by witness Abdulah Mandža; sketch map of Tuzla with marked route of the JNA withdrawal from that town;
- Legally binding defence provision, released in *BH Official Gazette* no. 4/92;
- Book entitled »From a Peace Oasis to a Muslim Tuzla«, written by Želimir Mladenović;
- Scheme of internal organisation and management in the Tuzla public security station.

Likewise, the herewith enclosed photos of the attack on the JNA column, taken by various authors on the withdrawal day, i.e. 15 May 1992, and duly registered by the War Crimes Prosecutor's Office, should be presented as trial evidence.

Finally, upon the trial completion and pursuant to article 269 (2) of the Criminal Procedure Act, the accused, Ilija JURISIĆ, should remain in detention on the grounds envisaged by article 142 (2/1,5) of the aforementioned Act.

Statement of reasons

The investigative authority of the Belgrade District Court's War Crimes Chamber conducted the investigation against the herein accused, Ilija JURISIĆ from Tuzla, on allegations of the criminal offence recognized by article 148 (2) re (1) (use of impermissible means of combat) of the SFRJ Criminal Code.

The investigation resulted in a substantial amount of written evidence and number of statements provided by victims and witnesses of the event at issue. The facts established on the collected data unambiguously suggest that the accused, Ilija JURISIĆ, is criminally responsible for the offence he is charged herewith.

The written document entitled *Cronology of key events in Bosnia-Herzegovina* offers ample testimony about armed conflicts in early 1992, including those which took place prior to the Tuzla incident of 15 May 1992. The existence of armed conflicts in BH at the time specified is corroborated by another relevant document, *Directive on the defence of BH sovereignty and independence*, issued by the BH territorial defence main staff on 23 April 1992. Reference to armed conflicts in the BH territory is also made in the report of activities for the period January 1992 - April 1993 (particularly on pages 8 through 14), issued by the Tuzla municipal assembly presidency.

Armed conflicts in the territory of Bosnia-Herzegovina, which had started prior to the day of the state's independence declaration and primarily involved the local Muslim (Bosniac), Croatian and Serbian ethnic groups, gained considerable momentum with the declaration of the state's independence on 3 March 1992.

Before it declared its independence, the Republic of Bosnia-Herzegovina had been one of the republics constituting the Socialist Federal Republic of Yugoslavia (SFRJ). Deployed over the whole of its territory (i.e. of its republics' territories), the SFRJ had its armed forces commonly named the Yugoslav People's Army (JNA).

In the aftermath of the state's newly declared independence, armed conflicts ensued between armed formations of Bosniac and Croatian ethnic groups on one side, and the Yugoslav People's Army on the other. The armed conflicts mainly involved attacks on the JNA military compounds situated in the BH territory.

According to the Geneva Conventions, the armed conflict between the Bosniac and Croatian ethnic groups on one side and the JNA on the other qualifies as an international armed conflict.

The declaration of BH independence on 3 March 1992 was followed by that of another new state, namely the Federal Republic of Yugoslavia (SRJ), which consisted of the two former SFRJ republics that remained together, i.e. the Republic of Serbia and the Republic of Montenegro.

In subsequence, the BH and SRJ state representatives concluded an agreement on peaceful withdrawal and removal of the JNA troops from the BH territory into that of SRJ. To that effect, the BH state's presidency rendered the decision no. 02-11-327/92 of 27 April 1992. The execution of the presidency's decision was supported by the relevant orders no. 02/145-1 and 10-70 of 29 April 1992, respectively issued by the BH ministries of defence and the interior.

Further to the BH - SRJ agreement, the deadline for the JNA removal from the BH territory was 19 May 1992.

The Tuzla-based JNA military compound named Husinjska Buna was under the command of lieutenant colonel Mile Dubajić. In the course of several days ahead of 15 May 1992 and on that day, lieutenant colonel Dubajić was involved in negotiations with the Tuzla civil and military authorities, related to the details of the JNA peaceful evacuation from the compound. Specifically, the negotiations were conducted between Dubajić on one side and the following BH officials on the other: Selim Bešliagić, president of the Tuzla municipal assembly and of the crisis staff presidency;

Enver Delibegović, territorial defence staff commander; and Mehmed Bajrić aka Mešo, head of the Tuzla public security centre. In the agreement reached by the two parties, 15 May 1992 was determined as the evacuation date. Lieutenant colonel Dubajić received guarantees from the representatives of the Tuzla civil and military authorities that the JNA troops would be enabled a safe evacuation from the Husinjska Buna barracks and an undisturbed withdrawal down the route leading from the barracks along Skojevska Street up to Brčanska Malta junction and further to Bijeljina.

Parallely with the JNA withdrawal negotiations, the Tuzla municipal crisis staff was conducting detailed preparations for the deployment of their troops along the approved withdrawal route. The preparations and military occupation of buildings and shelters situated along the withdrawal route increased momentum on the withdrawal day, namely 15 May 1992. Further to a perfidious plan elaborated at a crisis staff meeting and contrary to what had been agreed and guaranteed, the JNA column was to be attacked, with massive seizures of its personnel and material assets. To that goal, the crisis staff established the operational command unit and operational staff team within the public security centre. The two groups were assigned to resume joint command over the territorial defence force (the so-called »Patriotic League«) and police in operations allegedly intended to defend the city. A permanent radio link was established and maintained between the operational staff and their troops in the field.

As of 6 April 1992, the accused, Ilija JURISIĆ, was a member of the BH police reserve forces. A high-ranking commander in the former state security service, JURISIĆ was assigned to command duties in the operational staff of the Tuzla public security centre. At each point in time, competencies were shared between a number of operational staff members, of whom one, the so-called operational centre duty commander, bore ultimate responsibility. Among others entitled to act in that capacity was also the accused, Ilija JURISIĆ.

On the 15th day of May 1992, Ilija JURISIĆ took on the duty as commander in the Operational Centre at 14:00. He was informed by his predecessor, and was also personally aware of the fact that the first attempt of the JNA evacuation from the barracks had resulted in failure, as the column had been denied passage and ordered to return to the barracks. Following that incident, JURISIĆ also had knowledge of the fact that his superior, head of the public security station Mehmed BAJRIĆ aka Mešo, and some other officers had gone to the barracks for further negotiations with lieutenant colonel DUBAJIĆ.

The purpose of forcing the JNA column back to the barracks was to allow sufficient time for full realisation of the perfidious plan elaborated beforehand by the crisis staff. By 19:00, all exit roads had been blocked, while the delineated withdrawal route had been placed under full military control. The duty of the perfidious plan realisation lay with the operational staff and the units deployed all along the route, namely members of the territorial defence, Patriotic League and public security service.

At 19:00, the JNA marching column left the military compound Husinjska Buna and started moving along the approved route. The column was headed by a police vehicle belonging to the Tuzla public security service. On board the vehicle moving behind it were lieutenant colonel Mile Dubajić and a member of the Tuzla territorial defence. The territorial defence, Patriotic League and public security forces positioned along

the withdrawal route did not refuse passage to the front part of the column. At the time present in the operational staff of the Tuzla public security centre, which was situated several hundred metres away from the withdrawal route, were C.Z., a FNU LNU, two female snipers and the duty commander, i.e. Ilija JURISIĆ.

Shortly following the JNA column's departure from the barracks, Mehmed Bajrić aka Mešo came to the operational staff and instructed the accused, JURISIĆ, to order attacks on the column. Evidently, Bajrić had been informed that the front part of the column, escorted by the local police and territorial defence representatives as an alleged guarantee that there would be no attacks, had already left Tuzla.

As instructed by his superior Bajrić, the accused, Ilija JURISIĆ, took a microphone, reached his personnel in the field via the radio link and ordered that fire be opened at the marching column. As the order was issued, the central part of the column was moving along Skojevaska Street and approaching Brčanska Malta crossroads. Moving within the central part of the column were also a number of military ambulances, which were visibly and duly marked. The ambulances and other military vehicles were carrying the JNA and medical staffs who were unprepared for fight or defence as they had not expected to be attacked. As they marched in the column, the JNA troops were acting in full compliance with the BH presidency's decision on the JNA peaceful evacuation from the BH territory, which had been rendered further to lieutenant colonel Dubajić's agreement with the Tuzla military and civil authorities, whereby the JNA forces had been provided guarantees of safety.

The accused, Ilija JURISIĆ, was aware of the BH Presidency's decision, of the agreements reached and of the safety guarantees given to lieutenant colonel DUBAJIĆ. However, acting further to a previously devised perfidious plan, in breach of the provisions contained in article 19 of the Geneva Conventions and articles 21 and 37(1) of Protocol I thereto, JURISIĆ ordered attacks against the JNA marching column, which is recognised by international law as an impermissible means of combat, and as such prohibited. As he was issuing the attack orders, JURISIĆ made no indications whatsoever that military ambulances should not be attacked, although he was aware of the existence of a medical team within the 92nd motorised brigade.

The fact that the attacks had been planned beforehand is corroborated by a body of evidence suggesting the method and the course thereof. The onset of the attacks was marked by the killings of the drivers, whereby the vehicles were brought to a halt. Likewise, a number of vehicles were stopped by the series of anti-personnel mines, previously laid along the column's withdrawal route and activated by the attackers as the vehicles passed by. The resulting hold-ups blocked further passage of the troops. The JNA soldiers who had been inside the vehicles came under heavy fire as they started jumping out. As a result, many were killed or wounded. The attacks launched against the visibly marked military ambulances followed the identical pattern.

In the course of the attack operations a minimum of 92 JNA soldiers were killed, whereas at least 33 were wounded. Names and other personal details of the JNA soldiers who were killed or wounded have been listed in the enacting terms hereof.

Based on the legal assessment of the state of matters established throughout the investigation is the conclusion that in the acts of the herein accused individual are

contained all relevant elements of the criminal offence recognised by article 148 (2) re (1) (use of impermissible means of combat) of the SFRJ Criminal Code.

The criminal responsibility of the accused JURIŠIĆ arises from the fact that he was aware of his act and intentionally engaged therein, which, in the light of his clear state of mind and will, indicates that his crime was committed with direct premeditation.

In his defence pleas, JURIŠIĆ confirmed his official capacities and competencies within the operational staff, and admitted to the issuing of the above described order. His point, however, was that he had issued the order upon his superior's request and after being informed that the JNA column had attacked the city of Tuzla.

The fact that the defence allegations presented by the accused are unfounded is corroborated by the collected evidence, which clearly suggests the untruthfulness of such allegations. Namely, the JNA soldiers who were marching in the column launched no attacks whatsoever, since it has been positively established that no losses, either material or human, were inflicted upon the other side, i.e. the true attackers. Moreover, the accused himself states in his defence allegations that, although he had heard a few sporadic shots before issuing the attack order, he did not request any reports thereon from the field commanders, all of whom he knew by name. Once the attack had been over, the accused in his capacity as operational staff duty commander did not seek to be delivered reports from the field, neither did he log any facts related to the attack, destroyed vehicles or human casualties incurred by the JNA forces.

In view of the foregoing, the acting of the accused, who »worked« double shift on the critical occasion, offers no indication whatsoever that he was taken aback by the developments. On the contrary, all these circumstances clearly suggest that the herein accused acted within the framework of a previously devised and elaborated perfidious plan of the attack on the JNA column. Such a conclusion is thoroughly corroborated by the document entitled »Report on the activities undertaken by the Tuzla Municipal Presidency in the period January 1992 - April 1993.«

Since on the part of the accused no circumstances have been found to exclude his criminal responsibility, I hereby propose that the War Crimes Chamber of the District Court in Belgrade pronounce him guilty, whereby he should be sentenced as required by statute and bound to bear the expenses arising from these legal proceedings.

Considering the facts that the accused, Ilija JURIŠIĆ has residence in another state and holds dual citizenship in Bosnia-Herzegovina and in Croatia; that the criminal offence he is charged with under article 148 (2) re (1) (use of impermissible means of combat) of the SFRJ Criminal Code is punishable by a sentence of over ten years' duration; that the commission of the criminal offence resulted in the deaths of at least 92 and the wounding of at least 33 JNA members, alongside the destruction of a substantial number of military vehicles and ambulances, I deem it appropriate that the Court **extend the period of detention** for the accused.

Vladimir Vukčević
War Crimes Prosecutor