



Tužilaštvo-Tužiteljstvo Bosne i Hercegovine
Тужилаштво Босне и Херцеговине
Prosecutor's Office of Bosnia and Herzegovina

No: KT-RZ-17/05
Sarajevo, 29 June 2009

THE COURT OF BOSNIA AND HERZEGOVINA

Ref. No. X-KR-05/46

Enclosed with the letter is the amended Indictment against Rade Veselinović that now reads:

During the period from early May 1992 up to late 1992, within a widespread and systematic attack of the Republika Srpska Army (hereinafter: RSA), members of the Military Police, RS Police and paramilitary formations, which was targeted against civilians of non-Serbian ethnicity in the broader area of Hadžići Municipality, first as a member of the RS Police forces and then as a member of the Military Police of the RSA from Hadžići, knowing of such an attack, he carried out, aided and abetted in the persecution of non-Serbian population in the area of Hadžići Municipality on political, national, ethnic, cultural and religious grounds by way of killing, unlawful imprisonment, torture, enforced disappearances, immense suffering and violation of bodily integrity and by other inhumane acts perpetrated with the intention of causing great anguish, inflicting serious bodily injuries and damaging their health in the way that:

1. During the period from early May 1992 until the end of 1992, together with other members of the RSA from Hadžići, he participated in the unlawful arrests of the non-Serbian population of Hadžići and the villages of Žunovnica, Musići, Binježevo, Kućice and other surrounding places, who were taken to the detention centre in the Cultural-Sports and Recreational Centre Hall in Hadžići, where they were beaten up and physically abused. They also allowed unidentified members of paramilitary formations to ill-treat the detained people by beating them up, requesting men to perform lewd acts among themselves, gave them meagre food and took them to the front lines to dig trenches, cut wood and do other hard labour,

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2. On 16 May 1992, in the street in front of the Cultural Centre in Hadžići, he fired from his automatic rifle at [REDACTED], a person of Croatian ethnicity, for no reason whatsoever and wounded him,

3. In late May or early June 1992, when detained civilians [REDACTED] and a person whose last name was [REDACTED], were taken out for forcible labour from the camp to the Cultural-Sports and Recreational Centre Hall in Hadžići, to transport by car a stove from the place called Kućice towards Hadžići, he stopped them on their way to Hadžići and pulled [REDACTED] out of the car, swearing his *Šiptar*¹ mother, started to kick and punch him all over his body, slapped him in the face, then he pulled out his pistol and whipped [REDACTED] who started bleeding down his face and he still has scars on his head as a consequence. He then pulled [REDACTED] out of the car and started to kick and punch him all over his body, putting his pistol to his temple and threatened to kill him,

4. On an unspecified date in June 1992, together with a group of unidentified armed members of the Republika Srpska Army, he came to Donji Hadžići, where they found [REDACTED] and one unidentified member of the Republika Srpska Army killed her from his fire arms,

5. On or about 4 July 1992, together with members of the Military Police from Hadžići, he arrived in front of a building located at 8 JNA Street in Hadžići, entered the building, brought out [REDACTED] took him away in an unknown direction in a *Pinzgauer* vehicle and he disappeared without a trace,

6. On an unspecified date in late 1992, close to the village of Breza, Hadžići Municipality, he ill-treated [REDACTED]. He stopped her in the road, grabbed her breasts, pushed her to a tree, leaned her against the tree and fired a number of bullets above her head, deafening her,

Therefore, within a widespread and systematic attack of the Republika Srpska Army on the broader area of Hadžići Municipality, knowing of such attack, he perpetrated, aided and abetted in the persecution of population of non-Serbian ethnicity in the area of Hadžići Municipality on political, national, ethnic, cultural and religious grounds by way of killings, unlawful imprisonment, torture, enforced disappearances, immense suffering or violation of bodily integrity and by other inhumane acts perpetrated with the intention of causing great anguish, inflicting serious bodily injuries and damaging their health,

Whereby, by carrying out the offences described in Count 1 of the Indictment, he committed the criminal offence of Crimes against Humanity in violation of Article 172/1/h/, as read with sub-paragraphs c), e), and f) of the CC of BiH,

- Under Counts 2 and 3 of the Indictment, he is charged with having committed the criminal offence in violation of Article 172/1/k/, in conjunction with Article 29 of the CC of BiH,

¹ Translator's note: Derogatory for Albanians

- Under Count 4 of the Indictment, he is charged with having committed the criminal offence in violation of Article 172/1/a/, in conjunction with Article 31 of the CC of BiH.
- Under Count 5 of the Indictment, he is charged with having committed the criminal offence in violation of Article 172/1/i/, in conjunction with Article 29 of the CC of BiH,
- Under Count 6 of the Indictment, he is charged with having committed the criminal offence in violation of Article 172/1/f/ of the CC of BiH,

all in conjunction with Articles 29 and 180 of the CC of BiH.

**PROSECUTOR OF THE
PROSECUTOR'S OFFICE OF BIH**
Dubravko Čampara
/signature and stamp affixed/