



Republic of Serbia  
PUBLIC WAR CRIME  
PROSECUTOR'S OFFICE  
KTO no. 2/2023  
15 December 2023  
Belgrade  
MS/IP

***HIGHER COURT IN BELGRADE***  
***War Crimes Department***

**BELGRADE**

Based on Article 331 paras 1 and 2 in regards to Article 43 para 2 count 5 of the Criminal Procedure Code, and related to the provisions of Article 3 and Article 4 of the Law on the Organization and Competence of State Authorities in War Crimes Proceedings, I am raising an

***INDICTMENT***

Against:

**A. A.**

due to the existence of justified suspicion that:

During October and November 1991, they had violated the rules of international law during the armed conflict, namely the non-international armed conflict that existed in the Republic of Croatia, which was then part of the then Socialist Federal Republic of Yugoslavia, between the Yugoslav People's Army, the Territorial Defense, the Volunteers units on the one hand and organized armed formations, so-called The National Guard Corps (ZNG) and the Croatian Ministry of Internal Affairs, on the other hand, contrary to Article 3, paragraph 1, count c, Article 27, para 2 of the IV Geneva Convention on the Protection of Civilians in Time of War of 12 August 1949 and Article 4, para 2, count e of the Supplementary Protocol to the Geneva Conventions dated August 12, 1949 on the Protection of Victims of Non-International Armed Conflicts (Protocol II), as a member of the Territorial Defense, raped civilian A.B. three times, by carrying out the following:

On several occasions, he had come to the family house located in Proleterska Street in Vukovar, where the victim was temporarily staying, forcing the victim to have coitus three times with the use of force and the threat that he would directly attack the victim's life and body by always coming armed, and when he first arrived he threatened the victim to bring more people to rape her if she resisted, asking if she was pregnant and saying that "Croatian women should be forced to give birth to Serbian children". He then took off his clothes and attacked the victim, forcibly stripping her, laying on top of her and forcibly inserting his genital organ into hers, in order to get dressed and leave, after which he came on two more occasions in the evening to the house, armed and in uniform, and every time he would strip, forcefully undress the victim and lay on top of her and insert his genital organ into hers, after which he got dressed and left.

- **By which he had committed the crime of war crime against the civilian population from Article 142 para 1 of the CC of SRY.**