

**SUPPLEMENT TO THE REQUEST FOR THE INDICATION OF
PROVISIONAL MEASURES OF PROTECTION SUBMITTED BY THE
GOVERNMENT OF THE REPUBLIC OF BOSNIA AND HERZEGOVINA**

8 August 1993

To His Excellency the President, to the Judges of the International Court of Justice, the undersigned being duly authorized by the Republic of Bosnia and Herzegovina:

I have the honor to refer to the **REQUEST FOR THE INDICATION OF PROVISIONAL MEASURES OF PROTECTION SUBMITTED BY THE GOVERNMENT OF THE REPUBLIC OF BOSNIA AND HERZEGOVINA**, that I filed with the Court on 27 July 1993. For reasons fully explained therein, I respectfully reserved "the right to amend, supplement, or alter, this Request for additional provisional measures at any time." Since that date of filing, numerous facts have come to my attention that have a decisive bearing upon our Request. For this reason, I hereby supplement Section B of our Request as follows:

B. Chronology of Respondent's Violations of This Court's Order of 8 April 1993.

19 July 1993

General Ratko Mladic admitted that the new attacks on Sarajevo were designed to place pressure on the Bosnian government to accept partition. General Mladic stated:

"It is up to Alija and those who advise him to think what to do. I have left Sarajevo to the end."

"Bosnia Threatens To Boycott Talks", Financial Times, 19 July 1993.

20 July 1993

Serbs began another bombardment of Mt. Igman, while Serbian forces closed in on positions in Sarajevo. "U.S. Alarmed At Bosnia But Plans No New Initiative," Reuters, 20 July 1993.

21 July 1993

Alija Izetbegovic predicted that the Serbs would begin attacking Sarajevo proper, and asked for aid. In addition, Dr. Radovan Karadzic announced plans to unite his self-proclaimed republic in Bosnia with the Serb-held regions of Croatia, thus providing the next step in the creation of "Greater Serbia." "Bosnian President Requests U.N. Help; Serbs Raise Stakes, Attack Sarajevo," Chicago Tribune, 21 July 1993.

22 July 1993

General Ratko Mladic openly declared that his attacks on Sarajevo were very successful, and was quoted as saying:

"Things are moving very well, according to plan. And they will get even better. [emphasis added]"

Despite the U.N. ban on military flights, Gen. Mladic toured the battlefield on a Serbian military helicopter and even allowed himself to be photographed picnicking next to it.

In addition, 10,000 people, mainly Muslims, were forced to flee from an area around Maglaj encircled by Serbian and Croatian forces. Reports warned that 40,000 people trapped in the "Maglaj pocket" were faced with imminent starvation. "Bosnia Serbs Drive To Take Sarajevo: U.N. Is Kept Back", The New York Times, 22 July 1993.

In peacetime, the ratio of births to abortions in Sarajevo was three to one in favor of births. Since the war, those figures have been reversed. Many women cited lack of food and other necessities as a reason for aborting their fetuses.

Furthermore, since the war began, the rate of premature births has doubled to 12%, the proportion of stillborn births to live births had jumped 60% to 12 per 1,000, and the rate of miscarriages rose from 15 per 1,000 pregnancies to 26 per 1,000. "Abortion Rate Soars In Bosnia's Dispirited Capital," Reuters, 22 July 1993.

23 July 1993

Serbs began another process of artillery bombardment of Sarajevo. Hospitals reported that at least 10 people were killed and more than 50 seriously wounded, but with the heavy bombardment, officials admitted that many more killed and wounded had not been brought in. Almost all casualties were civilians. Serbs also set up sniper ambushes in all open areas of the city.

In addition, President Bill Clinton stated publicly:
"We have aggressively committed ourselves to the process in Geneva."

"Serbs' Attack on Sarajevo Keeps Bosnians From Talks", The New York Times, 23 July 1993.

In a statement read in a formal session by President Sir David Hannay, the Security Council singled out and condemned the Serb offensive on Mount Igman. The report stated the offensive was aimed at further isolating Sarajevo. "Council Demands End To Fighting in Bosnia Before Resuming Negotiations", Agence France Presse, 23 July 1993.

24 July 1993

Serbian commanders led by General Ratko Mladic began another sustained offensive to capture the Western parts of Sarajevo. 3,777 shells hit the city in a 16-hour period, U.N. observers recorded. U.N. forces also estimated that the Serbs were using as many as 300 artillery pieces in the attack. A Serbian military commander, Colonel Sasoje Cojic, described the Serbian offensive as:

"The beginning of the end of the Muslim forces in this area and of the capture of Sarajevo by Serbian forces."

"3,777 Shells Hit in 16-Hour Siege As Serb Pincers Close on Sarajevo," The New York Times, 24 July 1993.

Ahmed Zin, of the Egyptian aid agency designated to provide group homes for the orphans of Bosnian rape victims, estimated that between 500 and 600 children of rape by Serbs had been born in the last few months. He speculated that many more were probably trapped with their mothers in the 70% of Bosnia under Serbian control.

Branka Herljevic, a Sarajevo lawyer and refugee stated that in Bosnian society, there was little chance that the children of rape victims could be raised by their mothers. "Bosnia's Orphans of Rape: Innocent Legacy of Hatred," Los Angeles Times, 24 July 1993.

25 July 1993

Serbian artillery bombarded the Bosnian-held hill of Zuc around Sarajevo. U.N. military observers stated the Serb attacks were designed to allow the Serbs to gain maximum tactical

advantage before the latest ceasefire.

In addition, Serbs forces captured three villages (Lipovac, Kolonija, and Brod) on the southern outskirts of Brcko. "Firing Continues in Sarajevo Area Despite Truce Deadline", Agence France Presse, 25 July 1993.

26 July 1993

Belgian Lt. Gen. Francis Briquemont accused Serbs of a "dirty assault" on a UNPROFOR parking lot in Sarajevo, where 8 U.N. military vehicles were damaged and 2 were destroyed. At least 480 shells hit all of Sarajevo proper.

In addition, Bosnian Serbs attacked Olovo, Maglaj, Zavidovici, Bugojno, and Novi Travnik in central Bosnia. "U.N. Commander Says His Peacekeepers Will Fire Back If Attacked", UPI, 26 July 1993.

27 July 1993

Commander Barry Frewer of UNHCR reported that large numbers of refugees from the Brcko area were trekking over a grueling mountain pass. The refugees were reported to be mainly Muslim women, children, and elderly people. The refugees were apparently fleeing new Serb artillery and tank assaults in Brcko.

In addition, Tomislav Cetouane, an aid worker for the French relief agency Solidarite, stated that refugees on Mount Igman were in desperate straits. Quoting Cetouane:

"The situation regarding food is very bad. They have not had regular food supplies for three or four months. The weather conditions during the winter on Igman are very harsh. The displaced people left their houses and didn't have time to take reserves of food so winter will be very difficult in this area."

"Refugees Trek South From North Bosnian Fighting", Reuters, 27 July 1993.

28 July 1993

Serbs began another offensive against Brcko, the eighth straight day of Serbian assaults. Cedric Thornberry of UNPROFOR reported that the refugees continued to flow ~~to~~ from the area. "Serbs Strengthen Control of Northern Bosnian Corridor", UPI, 28 July 1993. FAB

29 July 1993

The United Nations admitted that the "safe areas" set up in Bosnia to protect Muslims do not exist. Barry Frewer of the U.N. stated that the international body never guaranteed protection to Muslim civilians. Frewer noted that without agreement from the Bosnian Serbs, the safe areas were worthless.

The safe areas were thought of as a poor consolation prize for the Muslims after the rejection of the Vance-Owen plan by the Bosnian Serbs. When the U.N. declared that it would not force the Serbs to give up their conquered territory, the Serbs pressed their aggression even further. This has led the Serbian leader Radovan Karadzic to endorse "safe areas" while at the same time demanding half of Sarajevo, and all of Goradze, Zepa, and Srebrenica (all U.N. declared "safe areas").

Appeasement of the Serbs has become so prevalent that the French government declared a Serbian artillery strike against French U.N. forces "did not constitute a direct threat" to the French troops, stating that the shells landed several hundred yards away. However, eyewitnesses to the attack stated that the shells landed only 50 yards away, forcing the troops to run for cover. The shells were part of a Serbian plan to prevent the French troops from setting up "safe areas" in Sarajevo by placing "trip-wire" positions on the main exits to and from the city.

Finally, the U.N. admitted with acute embarrassment that while U.N. chief Lt. Gen Francis Briquemont had issued a tough warning to the Serbs regarding the Serb attacks and was seeking an explanation from Bosnian Serb commander Ratko Mladic, the U.N. commander had not been able to make contact with Mladic for two days. "Saving Sarajevo: U.N. Admits That 'Safe Areas' Do Not Exist", The Independent, 29 July 1993.

Radovan Karadzic admitted that the Bosnian Serbs were not respecting the current truce, indicating that his forces would adhere only to the latest ceasefire. Bosnian Serbs continued to their attacks on Sarajevo, Zuc hill around Sarajevo, and around Brcko. "Fighting Continues In Bosnia Despite Ceasefire Call", Agence France Presse, 29 July 1993.

30 July 1993

Hospital sources in Sarajevo stated a total of 7 people had been killed and 33 wounded by shells and sniper fire. In one incident, a shell landed on a downtown Sarajevo courtyard where a group of children were playing, supervised by their mothers. One boy and two women were killed, while seven children and five adults were wounded. One artillery shell landed on the base of the Spanish contingent of the U.N. forces in Sarajevo, killing one

soldier and wounding 17. "Rival Military Leaders Discuss Ceasefire", Agence France Presse, 30 July 1993.

Several analysts stated that partition of Bosnia would not end the war, but instead push it in a new direction. Quoting Andrew McHallam, executive director of the London-based Institute for European Defense:

"Partition will be a fig leaf. I think a guerilla war can be expected in Bosnia for many years to come. Populations have been displaced. Setting down frontiers could create an even greater bloodbath once people realize they are on the wrong side. We have appeased aggression. I am quite concerned by what one sees in central Asia, in parts of Africa, in South Africa, in Northern Ireland. The idea has gained ground that if one group wipes out a population or forces them out, no one in the West will force them to stop."

Also quoting Jonathan Eyall, an analyst at London's Royal United Services Institute:

"The Muslims will not forget the betrayal - that the West did not come to their help after recognizing Bosnia as an independent state."

"The Perils of Partition for Bosnia; Few Analysts See Hope for Peace After Division", The Boston Globe, 30 July 1993.

31 July 1993

Bosnian forces came under repeated attacks from Serbs in Maglaj, Tesanj, Zavidovici, Olovo, and Brcko, as part of the general Serbian offensive in that area. "Owen Cautious After Bosnian Accord," Press Association Newsfile, 31 July 1993.

1 August 1993

U.N. officials acknowledged that partition of Bosnia would result in the same levels of violence witnessed in 1947, when India and Pakistan became independent. One official stated:

"Think Punjab [in India, where thousands of people suffered acts of violence following the India-Pakistan split of 1947], think hundreds of thousands of people pulling up stakes and forcing hundreds of thousands of other people to

do the same. Everybody here is busy planning for winter, as if this country is going to look the same as it does now. They don't realize that once this partition goes down, all hell could break loose."

U.N. Commander Barry Frewer agreed with this assessment.

In addition, Serbian attacks were reported against Muslim areas of Maglaj, Tesanj, and Zavidovici, three towns the U.N. believe could be cut off by a combined Serb-Croat offensive. "Accord at Peace Talks Brings More Intense Combat in Bosnia; Migration Expected to Follow Partition, U.N. Unsure How to React," The Washington Post, 1 August 1993.

U.N. officials reported that 5,000 Serbian shells struck Sarajevo in a three-day period. Much of the Serbian offensive was designed to take Zuc hill, a strategically important area. If the Serbs captured the hill, it would allow them to freely fire into any part of Sarajevo.

In addition, the U.N. noted that the Serbian leader Radovan Karadzic once again reneged on an agreement to allow water and humanitarian supplies into Sarajevo. Power and water had come on for a few days after the agreement was signed, but the Serbs turned them off again. "Serbs, Muslims Still Seek Upper Hand in Sarajevo; Partition Looms, But Combat Continues," The Washington Post, 1 August 1993.

2 August 1993

Serbs again attacked the strategic heights overlooking Sarajevo. The Serbs this time struck at Mount Bjelasnica. Furthermore, the Serbs continued their assaults on Brcko.

In addition, UNHCR officials noted that partition could create as many as a million new refugees. "Bosnian Leaders Oppose Plan to Carve Up the Country Into 3 States," The New York Times, 2 August 1993.

3 August 1993

Serbs further continued their assault on the heights surrounding Sarajevo, in an effort to put another stranglehold on the besieged capital. "Serbs Consolidate, Threaten Sarajevo Peak," Reuters, 3 August 1993.

4 August 1993

Peter Kessler, spokesman for UNHCR on the new offensive by

the Serbs to take Mount Igman:

"If Igman were to fall or if people were to fear the capture of this mountain, the vast majority would flee to Sarajevo through the airport. If there were to be 20 to 30,000 people to flee into the city, that would have a dramatic impact."

"Bosnians In 'Desperate Situation' to Save Mount Igman From Falling," Agence France Presse, 4 August 1993.

5 August 1993

Serbian general Ratko Mladic continued to press attacks on the heights surrounding Sarajevo, and refused to retreat from any of the territory. Ignoring the U.N. no-fly zone, he personally delivered his refusal in a military helicopter. "Bosnia: Talks fail As Serbs Take High Ground," The Independent, 5 August 1993.

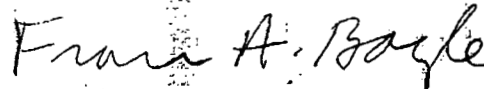
6 August 1993

For the third time, a U.S. State Department official criticized the U.S. government for inaction towards genocide against the Bosnian people. Marshall Harris, the U.S. desk officer on Bosnia, in his letter of resignation stated:

"I can no longer serve in a department of state that accepts the forceful dismemberment of a European state and that will not act against genocide and the Serbian officials who perpetrate it. The administration is driving the Bosnian government to surrender its territory and its sovereignty to the victors in a war of aggression."

"Resignation Reveals U.S. Split Over Bosnia; State Department Official Deplores Inaction on 'Genocide'," The Guardian, 6 August 1993.

Respectfully submitted by,



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