

IT-02-54-T
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21 June 2002

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THE INTERNATIONAL CRIMINAL TRIBUNAL
FOR THE FORMER YUGOSLAVIA

Case No. IT-02-54-T

IN THE TRIAL CHAMBER

Before: Judge Richard May, Presiding
Judge Patrick Lipton Robinson
Judge O-Gon Kwon

Registrar: Mr. Hans Holthuis

Date Filed: 21 June 2002

THE PROSECUTOR

v.

SLOBODAN MILOŠEVIĆ

PROSECUTION'S SUBMISSION OF THREE WRITTEN STATEMENTS
PROVIDED PURSUANT TO RULE 92 *BIS*

The Office of the Prosecutor:

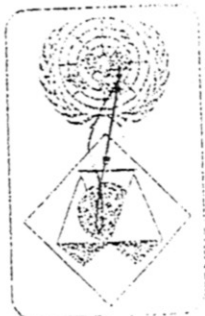
Ms. Carla del Ponte

Amicus Curiae:

Mr. Steven Kay
Mr. Branislav Tapušковиć
Mr. Michail Wladimiroff

The Accused

Mr. Slobodan Milošević



THE INTERNATIONAL CRIMINAL TRIBUNAL
FOR THE FORMER YUGOSLAVIA

THE PROSECUTOR

v.

SLOBODAN MILOŠEVIĆ

Case No. IT-02-54-T

PROSECUTION'S SUBMISSION OF THREE WRITTEN STATEMENTS

PROVIDED PURSUANT TO RULE 92 BIS

1. Pursuant to Rule 92 *bis* of the Rules of Procedure and Evidence (hereinafter "Rules"), the Prosecution submits the written statements of Mr. George Georgiou, Mr. Andreas Iacovou and Mr. Yiannakis Tsiartis to the Trial Chamber for its review. These written statements were provided to the Prosecution pursuant to Rule 92 *bis*. For the reasons provided in "Attachment A" to this submission, the Prosecution submits that cross-examination of these witnesses is not necessary.



Dirk Ryneveld
Senior Trial Attorney

Dated This Twenty-first Day of June 2002
In The Hague
The Netherlands



Attestation of Theodoros Stavrou

ATTESTATION OF INVESTIGATOR THEODOROS STAVROU

I, Theodoros Stavrou, Investigator with the Unit for Combating Money Laundering in the Law Office of the Republic of Cyprus, pursuant to the Judges' Rules of the Republic of Cyprus (attached hereto), Sections 1 – 4 of CAP 155 [Criminal Procedure] of the Statute Laws of Cyprus (attached hereto) and Rule 92 *bis* of the Rules of Procedure and Evidence of the United Nations International Criminal Tribunal for the former Yugoslavia ("ICTY"), certify:

that on 13 June 2002 in the Laiki Bank in Nicosia, Republic of Cyprus, the following person appeared:

GEORGE GEORGIU

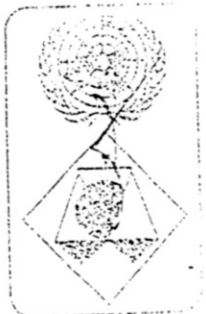
Born on 10 November 1959 in Nicosia, Republic of Cyprus

Republic of Cyprus Identity Card No. 552570

Habitually residing in Nicosia, Republic of Cyprus

- that in the attached statement dated 11 and 13 June 2002, George Georgiou is identified as the author;
- that the above-mentioned witness was provided with a version of the said statement in a language that he understands;
- that the above-mentioned witness was informed, in a language that he understands, by myself that if the contents of the written statement are not true to the best of his knowledge and belief then he may be subject to proceedings for giving false testimony;
- that the above-mentioned witness was provided with the text of Rule 91 of the Rules of Procedure and Evidence of the ICTY, in a language he understands;
- that the above-mentioned witness declared that the content of his written statement is true and correct to the best of his knowledge and belief;
- that no pressure was brought to bear on the witness and that he voluntarily signed the attached declaration dated 11 - 13 June 2002

that the following persons were present during the said declaration:
Theodoros Stavrou, George Georgiou, Kikis Talarides, Morten Torkildsen and Daniel Saxon

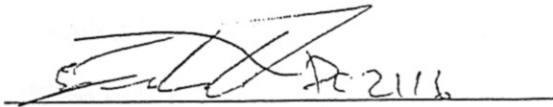


Additional Remarks

None

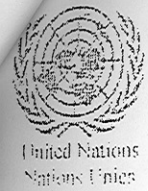
Done this 13th Day of June 2002

At Nicosia, Republic of Cyprus



Theodoros Stavrou
Investigator
Unit for Combating Money Laundering
The Law Office of the Republic of Cyprus
1, Apeli str., 1403 Nicosia
Republic of Cyprus





International Criminal Tribunal for the former Yugoslavia

Tribunal Pénal International pour l'ex-Yougoslavie

DECLARATION BY PERSON MAKING A WRITTEN STATEMENT PURSUANT TO RULE 92 BIS

I,

First and Last name(s): GEORGE GEORGIU

Date and Place of Birth: 10 November 1959, Nicosia, Republic of Cyprus

Identity-, or Passport No.: Identity No. 552570

hereby confirm, in the presence of Investigator Theodoros Stavrou that the contents of the written statement I made on 11 and 13 June 2002 and which is now attached to this declaration, is true and correct to the best of my knowledge and belief.

I have also been provided with a copy of Rule 91 of the Tribunal's Rules of Procedure and Evidence in a language which I understand and I understand that I may be subject to prosecution for giving false testimony if the contents of my written statement are not true and correct.

Done this: 13 June 2002

At: Taiki Bank
Nicosia
Republic of Cyprus

George Georgiou

Theodoros Stavrou,
Investigator
Unit for Combating Money Laundering
The Law Office of the Republic of Cyprus
1, Apeli str. 1403 Nicosia, Cyprus



INTERNATIONAL CRIMINAL TRIBUNAL FOR THE PROSECUTION
OF PERSONS RESPONSIBLE FOR SERIOUS VIOLATIONS
OF INTERNATIONAL LAW COMMITTED IN THE TERRITORY
OF THE FORMER YUGOSLAVIA SINCE 1991

WITNESS STATEMENT

WITNESS INFORMATION:

Last Name: Georgiou

First Name: George

Gender: Male

Date of Birth: 10 November 1959

Place of Birth: Nicosia

Language Written: English

Languages Used in Interview: English

Current Occupation: Head of Customer Service, International
Business Centre of Nicosia,
Laiki Bank, Republic of Cyprus

Former: Same

Date of Interview: 11 and 13 June 2002

Names of all other persons present during interview(s): Kikis Talarides, and
Theodoros Stavrou

WITNESS STATEMENT:

- I, George Georgiou, make the following statement which has been taken down by [redacted] I am giving this statement voluntarily and to the best of my knowledge.

[Handwritten signature]
 [redacted]
 Theodoros Stavrou 2002

2. My full name is George Georgiou. I was born on 10 November 1959 in Nicosia in the Republic of Cyprus.
3. I graduated college with a degree in Civil Engineering. I currently hold the position of head of Customer Service at the International Business Centre of Nicosia at the Laiki Bank in the Republic of Cyprus. I have the consent of the Laiki Bank in the Republic of Cyprus to make this statement on behalf of the Laiki Bank Limited ("Laiki Bank").
4. Based on my review of the records of the Laiki Bank, I can confirm that Antexol Trade Ltd. ("Antexol"), Browncourt Enterprises Ltd. ("Browncourt"), Cabcom Marketing Ltd. ("Cabcom"), Hillsay Marketing Ltd. ("Hillsay"), Lamoral Trading Ltd. ("Lamoral"), Southmed Holdings Ltd. ("Southmed"), Vericon Management Ltd. ("Vericon") and Vantervest Overseas Ltd. ("Vantervest"), (referred to collectively as "the eight Cypriot Companies") all held bank accounts with the Laiki Bank in the Republic of Cyprus.
5. I can confirm that among the debit transactions on Browncourt accounts were the following transactions:
 - On 29 January 1998 USD 175,040.00 was transferred to an account held by Abridge Trading with Hellenic bank in the Republic of Cyprus. I am referring to the document marked FI005484.
 - On 11 May 1998 DEM 385,000.00 was transferred to an account held by Abridge Trading with Hellenic bank in the Republic of Cyprus. I am referring to the document marked FI006803.
 - On 24 February 1999 USD 299,555.00 was transferred to an account held by Abridge Trading with Hellenic bank in the Republic of Cyprus. I am referring to the document marked FI005415.
6. According to the records of the Laiki Bank, I can further confirm that a number of transfers took place from the bank accounts of the Cypriot companies Vantervest, Lamoral and Vericon with the Laiki Bank to the accounts of Abridge Trading Ltd. ("Abridge Trading") with the Hellenic Bank. I have listed these transactions below:
 - On 23 June 1995 USD 380,500.00 was transferred from an account held by Vantervest to an account held by Abridge Trading with Hellenic Bank in the Republic of Cyprus. I am referring to the document marked FI002134.

[Handwritten signature]

[Handwritten signature]

- On 12 November 1996 USD 1,559,000.00 was transferred from an account held by Lamoral to an account held by Abridge Trading with Hellenic Bank in the Republic of Cyprus. I am referring to the document marked FI004001.
- On 25 November 1996 USD 1,491,212.00 was transferred from an account held by Lamoral to an account held by Abridge Trading with Hellenic Bank in the Republic of Cyprus. I am referring to the document marked FI004002.
- On 10 September 1997 USD 138,080.00 was transferred from an account held by Lamoral to an account held by Abridge Trading with Hellenic Bank in the Republic of Cyprus. I am referring to the document marked FI004025.
- On 10 September 1997 USD 210,000.00 was transferred from an account held by Lamoral to an account held by Abridge Trading with Hellenic Bank in the Republic of Cyprus. I am referring to the document marked FI004026.
- On 31 March 1998 USD 114,000.00 was transferred from an account held by Lamoral to an account held by Abridge Trading with Hellenic Bank in the Republic of Cyprus. I am referring to the document marked FI004146.
- On 6 April 1998 USD 66,900.00 was transferred from an account held by Lamoral to an account held by Abridge Trading with Hellenic Bank in the Republic of Cyprus. I am referring to the document marked FI004142.
- On 11 May 1998 USD 170,000.00 was transferred from an account held by Vericon to an account held by Abridge Trading with Hellenic Bank in the Republic of Cyprus. I am referring to the document marked FI005978.
- On 11 May 1998 USD 560,880.00 was transferred from an account held by Vericon to an account held by Abridge Trading with Hellenic Bank in the Republic of Cyprus. I am referring to the document marked FI005979.
- On 11 May 1998 USD 78,400.00 was transferred from an account held by Vericon to an account held by Abridge Trading with Hellenic Bank in the Republic of Cyprus. I am referring to the document marked FI005980.
- On 27 May 1998 USD 302,815.00 was transferred from an account held by Vericon to an account held by Abridge Trading with Hellenic Bank in the Republic of Cyprus. I am referring to the document marked FI006015.

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- I was shown a document produced by the Hellenic Bank in Limassol marked FI026098. According to the transaction reference number (020-05710-98), this transfer of USD 169,837.41 originates from the Laiki Bank branch of Limassol. The document states that the ordering customer is Vericon. I have not had the opportunity to review the records of the Limassol branch of the Laiki Bank to verify whether this transaction was completed.
- On 30 June 1998 USD 250,000.00 was transferred from an account held by Lamoral to an account held by Abridge Trading with Hellenic Bank in the Republic of Cyprus. I am referring to the document marked FI004074. I can state this because I was shown a document marked FI026129 produced by the Hellenic Bank. This document demonstrates that the amount of USD 250,000.00 mentioned above was transferred to the Hellenic Bank in favor of Abridge Trading.
- On 14 December 1998 USD 795,120.00 was transferred from an account held by Lamoral to an account held by Abridge Trading with Hellenic Bank in the Republic of Cyprus. I am referring to the document marked FI004163.
- On 21 December 1998 USD 212,640.00 was transferred from an account held by Lamoral to an account held by Abridge Trading with Hellenic Bank in the Republic of Cyprus. I am referring to the document marked FI004166.

7. If any discrepancies occur between the amounts of the transfers listed in paragraph 7 and the amounts on the relevant bank statements for these transactions, this is due to the fact that the Laiki Bank charged a commission for conducting each transaction.
8. This statement consists of five pages of text plus nineteen pages of attached documents that are referred to in the text of the statement. All of the documents referred to as "document(s) marked" are attached hereto. I confirm that all of these documents have been maintained and provided by the Laiki Bank in Nicosia, Republic of Cyprus, unless otherwise indicated specifically in my statement. I have initialised and dated all of the attached documents referred to in this statement.

9. I have read the above statement and I have been told that I can correct, alter or add anything I wish. This statement is true. I have made it of my own free will.

WITNESS ACKNOWLEDGEMENT

I have given this statement voluntarily and am aware that it may be used in legal proceedings before the International Criminal Tribunal for the Prosecution of Persons Responsible for Serious Violations of International Humanitarian Law Committed in the Territory of the Former Yugoslavia since 1991, and that I may be called to give evidence in public before the Tribunal.



George Georgiou

Attestation of Theodoros Stavrou

ATTESTATION OF INVESTIGATOR THEODOROS STAVROU

I, Theodoros Stavrou, Investigator with the Unit for Combating Money Laundering in the Law Office of the Republic of Cyprus, pursuant to the Judges' Rules of the Republic of Cyprus (attached hereto), Sections 1 – 4 of CAP 155 [Criminal Procedure] of the Statute Laws of Cyprus (attached hereto) and Rule 92 *bis* of the Rules of Procedure and Evidence of the United Nations International Criminal Tribunal for the former Yugoslavia ("ICTY"), certify:

that on 13 June 2002 in the Laiki Bank, in Nicosia, Republic of Cyprus, the following person appeared:

ANDREAS IACOVOU

Born on 1 February 1951 in Larnaca, Republic of Cyprus

Republic of Cyprus Identity Card No. 448692

Habitually residing in Larnaca, Republic of Cyprus

- that in the attached statement dated 11 and 13 June 2002 and certified by the undersigned on 13 June 2002, the said Andreas Iacovou is identified as the author;
- that the above-mentioned witness was provided with a version of the said statement in a language that he understands;
- that the above-mentioned witness was informed, in a language that he understands, by myself that if the contents of the written statement are not true to the best of his knowledge and belief then he may be subject to proceedings for giving false testimony;
- that the above-mentioned witness was provided with the text of Rule 91 of the Rules of Procedure and Evidence of the ICTY, in a language he understands;
- that the above-mentioned witness declared that the content of his written statement is true and correct to the best of his knowledge and belief;
- that no pressure was brought to bear on the witness and that he voluntarily signed the attached declaration dated 11 and 13 June 2002
- that the following persons were present during the said declaration:
Theodoros Stavrou, Kikis Talarides, Morten Torkildsen and Daniel Saxon



Attestation of Theodoros Stavrou

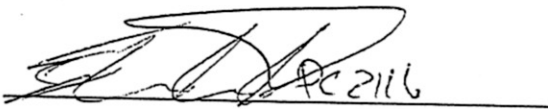
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Additional Remarks

None

Done this 13th Day of June 2002

At Nicosia, Republic of Cyprus



Theodoros Stavrou
Investigator
Unit for Combating Money Laundering
The Law Office of the Republic of Cyprus
1, Apeli str., 1403 Nicosia
Republic of Cyprus

F1043196



*DECLARATION BY PERSON MAKING A WRITTEN
STATEMENT PURSUANT TO RULE 92 BIS*



International
Criminal Tribunal
for the former
Yugoslavia

Tribunal Pénal
International pour
l'ex-Yugoslavie

I,

First and Last name(s): ANDREAS IACOVOU

Date and Place of Birth: 1 February 1951, Larnaca, Republic of Cyprus

Identity-, or Passport No.: Identity No. 448692


hereby confirm, in the presence of Investigator Theodoros Stavrou that the contents of the written statement I made on 11 and 13 June 2002 and which is now attached to this declaration, is true and correct to the best of my knowledge and belief.

I have also been provided with a copy of Rule 91 of the Tribunal's Rules of Procedure and Evidence in a language which I understand and I understand that I may be subject to prosecution for giving false testimony if the contents of my written statement are not true and correct.


Done this:

13 June 2002

At:

Laiki BankNicosiaRepublic of Cyprus


Andreas Iacovou



Theodoros Stavrou,
Investigator
Unit for Combating Money Laundering
The Law Office of the Republic of Cyprus
1, Apeli str. 1403 Nicosia, Cyprus



F1043208

INTERNATIONAL CRIMINAL TRIBUNAL FOR THE PROSECUTION
OF PERSONS RESPONSIBLE FOR SERIOUS VIOLATIONS
OF INTERNATIONAL LAW COMMITTED IN THE TERRITORY
OF THE FORMER YUGOSLAVIA SINCE 1991

WITNESS STATEMENT

WITNESS INFORMATION:

Last Name: Iacovou

First Name: Andreas

Gender: Male

Date of Birth: 1 February 1951 Place of Birth: Larnaca,

Language Written: English

Languages Used in Interview: English

Current Occupation: Assistant Manager, King Paul Branch, Larnaca, #048,
Laiki Bank, Republic of Cyprus

Former: Same

Date of Interview: 11 and 12 June 2002

Interviewer:

Names of all other persons present during interview(s): Kikis Talarides and Theodoros Stavrou

WITNESS STATEMENT:

- I, Andreas Iacovou, make the following statement which has been taken down by Morten Torkildsen. I am giving this statement voluntarily and to the best of my knowledge.

[Handwritten signature]

[Redacted signature]

[Handwritten signature]

2. My full name is Andreas Iacovou. I was born on 1 February 1951 in Larnaca, Republic of Cyprus.
3. I graduated from the Greek Gymnasium in Larnaca. I currently hold the position of Assistant Branch Manager with the Laiki Bank (previously named "Cyprus Popular Bank") at the King Paul Branch (#048) in Larnaca, the Republic of Cyprus.
4. I have the consent of the Laiki Bank in the Republic of Cyprus to make this statement on behalf of the Laiki Bank Limited ("Laiki Bank").
5. Based on my review of the records of the Laiki Bank, I can confirm that Browncourt Enterprises Ltd. ("Browncourt"), Vericon Management Ltd. ("Vericon") and Vantervest Overseas Ltd. ("Vantervest"), (referred to collectively as "the three Cypriot Companies") all held bank accounts with the Laiki Bank in the Republic of Cyprus.
6. Based on my review of the records of the Laiki Bank, I can confirm that Mrs. Borka Vucic was the Managing Director of Beogradska Bank Cyprus Offshore Unit ("BB COBU") during the entire period when these bank accounts operated.
7. Based on my review of the records of the Laiki Bank, I can state that a large portion of the funds deposited into the accounts of the three Cypriot companies were deposited in cash. The deposits of cash into these bank accounts started soon after the accounts were opened.
8. The cash deposits took place in the following way. Usually, the manager of Laiki Bank branch #48 would receive a telephone call from BB COBU informing the manager that cash would arrive at the Larnaca airport in the Republic of Cyprus at a particular time. Myself or my colleagues from Laiki Bank branch #048 would go to the Larnaca airport Customs Office at the scheduled time and meet the persons carrying the cash to the Republic of Cyprus. To the best of my recollection, these persons were always "Yugoslavs" who arrived on JAT flights from Belgrade. They carried the cash in two - five suitcases, depending on the amount of cash they were bringing to the Republic of Cyprus at that time. On the occasions when I provided

Signature _____
 (Witness)

 (Others present)

4/

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assistance, I would help the persons transporting the cash to complete the Customs Declaration Forms required by Cypriot law.

9. In the beginning, the persons transporting the cash had a note showing the total amounts of foreign currencies in the suitcases. These notes were used to complete the Customs Declaration Forms. Later on, they carried lists of denominations of different foreign currencies which were used to complete the Customs Declarations Forms. Attached hereto to my statement, are several examples of these lists, bearing ERNs FI026791 - 92, FI026803 - 04, FI026807 - 08. When the Customs Declaration Forms were complete, one of the persons who transported the cash to the Republic of Cyprus would sign the forms.

10. After the suitcases containing the cash were cleared through customs, the suitcases were transported to branch #048 in Larnaca. Subsequently, the cash was counted at branch #048. A representative of BB COBU and one of the persons who accompanied the cash to the Republic of Cyprus were always present in branch #048 while the cash was counted. I recall that when these cash deposits began in 1992, Mrs. Borka Vucic personally came to branch #048 on a few occasions when the cash was counted. I also recall that Mr. Slobodan Acimovic and Mr. Milan Dinic, employees of BB COBU, also came to branch #048 when the cash was counted. The representative of BB COBU who was present when the cash described in paragraph 12 below was deposited gave instructions to my colleagues or myself as to which of the three Cypriot Companies should be credited with the deposit. Depending on the currency (or currencies) of the cash deposits (US Dollars, German Marks, etc.), this person would also specify the particular foreign currency account that should be credited with the deposit.

11. Based on the records of the Laiki Bank, I confirm that all of the transactions listed below in paragraph 12 are cash deposits into DEM bank account 048-33-17016 held by Browncourt with Laiki Bank in the Republic of Cyprus. "DEM" is an international abbreviation for German Marks. Documentation concerning these cash deposits are all part of the records kept by the Laiki Bank concerning the bank accounts of

Signature _____

(Witness)

3

(Others present)

[Handwritten signatures and notes]

Browncourt. The documents referred to below contain, for each cash deposit into Browncourt's DEM bank account 048-33-17016 made between January 1998 and March 1999, the following documentation;

- a Customs Declaration showing the amounts of foreign currency that were declared through the Republic of Cyprus Customs, the date of the Declaration, and the name of the person who declared the foreign currency; and
- a bank voucher showing the credit of the DEM amount into Browncourt's DEM bank account 048-33-17016; and
- a bank statement showing the credit of the DEM amount into Browncourt's DEM bank account 048-33-17016.

12. Based on my review of the records of the Laiki Bank, I confirm that the information given in the table below is based on documents that originate from the Laiki Bank in the Republic of Cyprus. I have reviewed all the documents referred to with "ERN" in the table and I again confirm that each of them originates from the Laiki Bank.

Account 048-33-17016			Statement	Customs	Courier	Voucher
Date	Details	Credit	ERN	ERN	Name	ERN
29/01/98	Purchase Foreign Currency Notes	DEM 4,222,798	FI000965	FI026936	Markovic	FI026935
09/02/98	Purchase Foreign Currency Notes	DEM 2,752,175	FI000965	FI026938	Stanojevic	FI026937
16/02/98	Purchase Foreign Currency Notes	DEM 3,033,813	FI000967	FI026941	Markovic	FI026940
21/02/98	Purchase Foreign Currency Notes	DEM 3,241,160	FI000967	FI026943	Markovic	FI026942
09/03/98	Purchase Foreign Currency Notes	DEM 5,970,353	FI000969	FI026948	Stojkovic	FI026947
23/03/98	Purchase Foreign Currency Notes	DEM 5,789,259	FI000969	FI026950-51	Stojkovic	FI026949
06/04/98	Purchase Foreign Currency Notes	DEM 11,354,988	FI000969	FI026946	Stojkovic	FI026945
09/04/98	Journal Credit	DEM 8,349,961	FI000971	FI026954	Stojkovic	FI026953
23/04/98	Purchase Foreign Currency Notes	DEM 8,203,743	FI000971	FI026956	Stojkovic	FI026955

Signature

(Witness)

4

(Others present)

F1043212

04/05/98	Purchase Foreign Currency Notes	DEM	8,290,875	FI000973	FI026959	Stojkovic	FI026958
11/05/98	Purchase Foreign Currency Notes	DEM	5,565,988	FI000975	FI026962	Markovic	FI026961
18/05/98	Purchase Foreign Currency Notes	DEM	10,772,281	FI000975	FI026964	Stojkovic	FI026963
01/06/98	Purchase Foreign Currency Notes	DEM	9,332,168	FI000977	FI026967	Stojkovic	FI026966
11/06/98	Purchase Foreign Currency Notes	DEM	6,832,081	FI000979	FI026970	Stojkovic	FI026969
22/06/98	Purchase Foreign Currency Notes	DEM	8,566,854	FI000979	FI026972	Stojkovic	FI026971
02/07/98	Purchase Foreign Currency Notes	DEM	20,434,215	FI000981	FI026975	Stojkovic	FI026974
13/07/98	Purchase Foreign Currency Notes	DEM	12,971,925	FI000983	FI026978	Stojkovic	FI026977
20/07/98	Purchase Foreign Currency Notes	DEM	8,120,451	FI000983	FI026980	Stojkovic	FI026979
27/07/98	Purchase Foreign Currency Notes	DEM	9,287,867	FI000985	FI026983	Stojkovic	FI026982
03/08/98	Purchase Foreign Currency Notes	DEM	14,369,616	FI000985	FI026985	Stojkovic	FI026984
10/08/98	Purchase Foreign Currency Notes	DEM	14,437,333	FI000987	FI026988	Stojkovic	FI026987
24/08/98	Purchase Foreign Currency Notes	DEM	14,763,276	FI000989	FI026991	Stojkovic	FI026990
31/08/98	Purchase Foreign Currency Notes	DEM	9,267,463	FI000989	FI026993	Stojkovic	FI026992
07/09/98	Purchase Foreign Currency Notes	DEM	10,146,553	FI000991	FI026996	Stojkovic	FI026995
14/09/98	Purchase Foreign Currency Notes	DEM	9,534,241	FI000993	FI026999	Markovic	FI026998
17/09/98	Purchase Foreign Currency Notes	DEM	15,667,157	FI000993	FI027001	Stojkovic	FI027000
22/09/98	Purchase Foreign Currency Notes	DEM	6,401,671	FI000993	FI027003	Stojkovic	FI027002
02/10/98	Purchase Foreign Currency Notes	DEM	19,764,370	FI000995	FI027006	Stojkovic	FI027005
15/10/98	Purchase Foreign Currency Notes	DEM	15,140,209	FI000997	FI027009	Stojkovic	FI027008
02/11/98	Purchase Foreign Currency Notes	DEM	23,182,913	FI000999	FI027012	Stojkovic	FI027011

Signature

(Witness)

5

(Others present)

F1043213

09/11/98	Purchase Foreign Currency Notes	DEM	9,846,188	FI000999	FI027014	Stojkovic	FI027013
16/11/98	Purchase Foreign Currency Notes	DEM	9,969,805	FI001001	FI027017	Stojkovic	FI027016
23/11/98	Purchase Foreign Currency Notes	DEM	8,409,327	FI001001	FI027019	Stojkovic	FI027018
30/11/98	Purchase Foreign Currency Notes	DEM	5,810,748	FI001003	FI027022	Stojkovic	FI027021
09/12/98	Purchase Foreign Currency Notes	DEM	8,986,099	FI001005	FI027025	Stojkovic	FI027024
14/12/98	Purchase Foreign Currency Notes	DEM	6,003,835	FI001005	FI027027	Stojkovic	FI027026
21/12/98	Purchase Foreign Currency Notes	DEM	32,829,022	FI001005	FI027029	Stojkovic	FI027028
23/12/98	Purchase Foreign Currency Notes	DEM	13,133,273	FI001005	FI027031	Markovic	FI027030
28/12/98	Purchase Foreign Currency Notes	DEM	17,982,000	FI001007	FI027034	Stojkovic	FI027033
28/12/98	Purchase Foreign Currency Notes	DEM	16,822,056	FI001007	FI027034	Stojkovic	FI027035
07/01/99	Purchase Foreign Currency Notes	DEM	10,904,149	FI001009	MTIA 13-06-02		FI026780
20/01/99	Purchase Foreign Currency Notes	DEM	11,501,586	FI001009	FI026784	Stojkovic	FI026783
01/02/99	Purchase Foreign Currency Notes	DEM	13,707,508	FI001011	FI026787	Stojkovic	FI026786
03/02/99	Purchase Foreign Currency Notes	DEM	4,317,108	FI001013	FI026789- 92	Stojkovic	FI026788
10/02/99	Purchase Foreign Currency Notes	DEM	5,723,610	FI001013	FI026796	Stojkovic	FI026795
23/02/99	Purchase Foreign Currency Notes	DEM	5,382,107	FI001014	FI026802- 04	Stojkovic	FI026801
01/03/99	Purchase Foreign Currency Notes	DEM	10,587,676	FI001015	FI026806- 08	Stojkovic	FI026805
08/03/99	Purchase Foreign Currency Notes	DEM	3,148,543	FI001015	FI026810- 12	Stojkovic	FI026809
10/03/99	Purchase Foreign Currency Notes	DEM	3,119,022	FI001015	FI026814- 16	Acimovic	FI026813
22/03/99	Purchase Foreign Currency Notes	DEM	4,618,576	FI001016	FI026818- 20	Stojkovic	FI026817

Signature

(Witness)

6

(Others present)

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13. Based on this documentation, I can state that all of the DEM amounts that are listed on the Customs Declarations were credited to the DEM bank account 048-33-17016 held by Browncourt during the period January 1998 - March 1999. The DEM amounts listed on the bank statements are slightly less than the DEM amounts listed on the Customs Declarations. The reason for this discrepancy is that the Laiki Bank charged a handling fee for each cash deposit.
14. The common term that is used by the Laiki Bank on bank statements and credit vouchers to describe cash deposits is "PURCH. FCY NOTES". This is the abbreviation for "purchase of foreign currency notes". With one exception, this term is used on the bank statements and credit vouchers that record the cash deposits (listed in the table contained in paragraph 13 above) into the Browncourt account 048-33-17016 during the period January 1998 - March 1999. The single exception is the use of the term "Journal Credit" to describe a cash deposit made on 9th April 1998 for the amount of DEM 8,349,961. The term "PURCH. FCY NOTES" is a term consistently used by the Laiki Bank to describe cash deposits. The use of the term "Journal Credit" may have been due to human error.
15. My review of the copies of Customs Declarations maintained by the Laiki Bank (referred to in the table contained in paragraph 13 above), indicates that the names "Dragomir Stojkovic" (also listed as "Drakomir Stojkovic", "Drakomir Stojkovic" all with passport number 000001260), Zoran Markovic and Slobodan Acimovic are listed as the persons declaring the cash on the Customs Declarations.
16. Based on my review of a copy of the Customs Declaration marked FI027034, I can state that Drakomir Stojkovic declared DEM 34,838,895 in cash and some other amounts in foreign currency through Cypriot Customs on 27 December 1998. Further, I can confirm that Mr. Stojkovic arrived in Larnaca airport on that date aboard a private flight from Belgrade. In addition, the Customs Declaration states that the cash was intended for the account of Browncourt Enterprises Ltd. at the Cyprus Popular

Signature _____

(Witness)

7

(Others present)

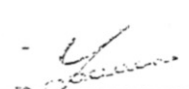
F1043215

Bank (now called "Laiki Bank"). According to the copies of credit vouchers marked FI027033 and FI027035, which I have reviewed, two deposits of DEM 17,982,000 and DEM 16,822,056.12 were made into Browncourt's DEM account 048-33-17016 on 28 December 1998. These two cash deposits are also confirmed on the bank statement marked FI001007. Based on my review of these records, I can state that the cash deposits made into the Browncourt DEM account 048-33-17016 on 28 December 1998 originate from the amounts declared by Mr. Stojkovic on the Customs Declaration dated 27 December 1998.

17. This statement consists of nine pages of text plus one hundred and 45 (145) pages of attached documents that are referred to in the text of the statement. All of the documents referred to as "document(s) marked ..." are attached hereto. I confirm that all of these documents have been maintained and provided by the Laiki Bank in Nicosia, Republic of Cyprus, unless otherwise indicated specifically in my statement. I have initialised and dated each page of the attachments referred to in this statement.
18. I have read the above statement and I have been told that I can correct, alter or add anything I wish. This statement is true. I have made it of my own free will.


WITNESS ACKNOWLEDGEMENT

I have given this Statement voluntarily and am aware that it may be used in legal proceedings before the International Criminal Tribunal for the Prosecution of Persons Responsible for Serious Violations of International Law Committed in the Territory of the Former Yugoslavia since 1991, and that I may be called to give evidence in public before the Tribunal.




 Andreas Iacovou

Signature _____ 8
 (Witness)



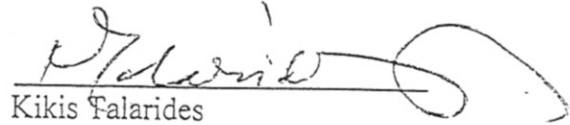
 (Others present)



F1043216

Taken down by me, Morten Torkildsen, today, 13 June 2002, at 1300 hours at the premises of the Laiki Bank in Nicosia, Republic of Cyprus, read by Andreas Iacovou and being correct, he signed in my presence and in the presence of Theodoros Stavrou, Kikis Talarides (Chief Counsel, Law Department of Laiki Bank) and Daniel Saxon.


Theodoros Stavrou


Kikis Talarides



Signature _____ 9 _____
(Witness) (Others present)