

## Women as perpetrators of war crimes: a case of Bosnia and Herzegovina

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### Abstract

Having in mind the quantity of consequences that war crimes are leaving to their victims and society as a whole and the need for their prevention, it is very important to fully understand their nature. Data on the personality of the perpetrator can play an important role in accomplishing this goal. Starting with the examination of the place of women in the world of crime, the authors open the floor for a discussion about of the role of women in the perpetration of war crimes. Finally, they test their conceptual findings with actual cases, through a case study of the armed conflict in Bosnia and Herzegovina (1992-1995).

**Keywords:** women, perpetrator, criminal offense, war crime, verdict, Bosnia and Herzegovina, ICTY.

### 1. Introduction

Even though there are many international documents and national laws that prohibit the perpetration of war crimes and proscribe punitive measures for their perpetration, war crimes are still being perpetrated. There is a constant struggle between the international community and individual states regarding the establishment of the most efficient criminal politics that would result in the prevention of their perpetration. War

crimes are not confined to the annals of history or to a particular conflict, instead, they are currently being perpetrated in parts of the world, in front of all of humanity to witness. They are a part of the present.

According to Swart (2019), the fourth Geneva Convention of 1949 (hereafter "Geneva Convention") was an important international document that clarified the meaning of war crimes in many nations' legislation with the definition being prescribed in their Criminal Codes. Article 147 of the Geneva Convention defines a war crime as, "[a] willful killing, torture or inhuman treatment, including biological experiments, willfully causing great suffering or serious injury to body or health, unlawful deportation or transfer or unlawful confinement of a protected person, compelling a protected person to serve in the forces of a hostile power, or willfully depriving a protected person of the rights of fair and regular trial prescribed in the present Convention, taking of hostages and extensive destruction and appropriation of property, not justified by military necessity and carried out unlawfully and wantonly." Traditionally, discussion among legal scholars and practitioners about war crimes was based on this definition and it covered topics about their actions (*actus reus*), their boundaries of criminal responsibilities (*mens rea*), the procedural issues within trials for war crimes, and questions regarding sanctions. It was two decades ago when perpetrators of war crimes joined these topics.

The afore mentioned definition of war crimes has been written in gender neutral terms, implying that perpetrators might be both male and female and without regard to their age or nationality. Therefore, the definition provided an equal possibility for both genders to commit criminal offenses. However, in the practice, for a long period of time it was understood that war crimes are of male dominance, that warfare is male world, thus women do not commit war crimes. That misconception is still present among the wider population, although there were scholars from that time and are scholars currently that are determined to prove, exemplified by actual cases, that war crimes have been and are currently perpetrated by women. The general perception of role of women in the society, the role of women in crime in general, and the fact that both changed through the time clouded the vision of the existence of female criminals and their scientific intent, which skewed the approach of analyzing female perpetrators. But, with this kind of statement we must be careful, since throughout time, "gender linked war criminal roles are not in fact cross culturally consistent"

(Goldstein, 2003). That is why even with the existence of scientific data and legal sources, in some societies there is still the dominance of the stereotype of war and warfare being exclusively a male world, while in other societies they have overcome this belief. Just as Steffensmeier and Allan (1996) through (Heiskanen and Lietonen, 2016) stated, “the gender gap in crimes is smaller in social settings where female roles and statuses personally differ less from those of men: that is, in developed nations, compared to developing countries, in urban compared to rural settings; among minorities; among people of older ages compared to younger; and in time of war compared to peace time”.

This paper is aimed at testing the role of women in the perpetration of war crimes. It will question if “warfare is no longer just a men’s game” (Trisko Derden et al, 2019). Since the role of women in war crimes is being closely connected with the role of women in crime in general, the authors will first establish the extend of participation of women in general crime and then, through the literary analysis, the authors will present a scholastic understanding of the place and role(s) of women in warfare and their motivation to participate in war crimes. Then, the authors will test that conceptual foundation through the analysis of its applicability in practice, more precisely, through the case study of the war in Bosnia and Herzegovina (1992-1995). Even though many scientific articles can be found on topic of the role of women in crimes that analyze this question from a social aspect, philosophical aspect, and many other different aspects, none of them offer a case study and legal analysis of the role of women in the war crimes in Bosnia and Herzegovina. The armed conflict in Bosnia and Herzegovina took place in the middle of the Europe, at the end of the 21<sup>st</sup> century, brought hundreds of thousands of victims, and in long term resulted in deep consequences to the society. The war’s legal heritage is based on the verdicts of the International Criminal Tribunal for Yugoslavia (hereinafter: ICTY) and the State Court of Bosnia and Herzegovina, which both had jurisdiction for war crimes committed in Bosnia and Herzegovina, and they offer us good grounds for a legal analysis of the crimes that were perpetrated at the time and details about their perpetrators. Furthermore, the analysis of all final verdicts of those two courts in war crime cases will provide insight into whether and to what extent there were cases of war crimes perpetrated by women and will provide a profile of the women perpetrators of those crimes, which is indicative of the general characteristics of those female criminals.

This paper consists of four parts. After the introduction, in the second part titled, "Role of Women in Crime in General", the transformation of the perception of women as perpetrators of a criminal offense will be pointed out. In that part, the authors will present a scholastic understanding about female perpetrators and will offer relevant worldwide criminal statistics, which show the level of inclusion of women in the criminal zone. The third part of the paper will focus on the role of women in warfare and, more particularly, in the role of a war criminal. In the fourth part of the paper, the results of the analysis of all the final verdicts of the war crimes cases perpetrated by women in the ICTY and the State Court of Bosnia and Herzegovina will be presented. The analysis will not only include the type of war crime and its content, but also all the mitigating and aggravating circumstances under which these crimes were perpetrated, together with an analysis of the personality of these female war criminals. By structuring the paper in the afore mentioned fashion, it will reveal whether the example of Bosnia and Herzegovina fits into the general perception of women as perpetrators of crimes, specifically war crimes, and it will determine whether women show a tendency to commit these crimes. All this information will be important for scholars, practitioners, and legislators in determining the best criminal politics related to war crimes. In this paper analytical, normative, historical, and statistical scientific methods will be used.

## 2. Role of Women in Crime in General

Before we move to the analysis of women in crime in general, which is essential to understanding the perception and role of women in war crimes, and in order to have the correct insight in the content of object of our discussion, it is important to know the legal definition of *perpetrator*. According to Tomić (2008), a "perpetrator of a criminal offense is a human being, natural person, who can be the one who conducts the action of criminal offense, co-perpetrates or helps in its perpetration". Petrović (2005) states that a "perpetrator is a person who conducts the action of perpetration of a criminal offense and causes the consequence of the criminal offense". Dictionary.com (2020) defines a perpetrator as 'a person who perpetrates, or commits an illegal, criminal, or evil act' (Dictionary.com, 2020). Viljoen (2020) also describes a perpetrator as a person whose actions, attitude and personal qualities can be identified with

a specific criminal description (Viljoen, 2020). According to the same author (2020), besides direct and indirect perpetrators, there are three categories of perpetrators: the actual perpetrator, the co-principal or accomplices, and the beneficiary (Viljoen, 2020). Interestingly, Barnett (2020) does not only see a perpetrator as a person but also as an idea or concept.

In the above offered legal definitions of perpetrator, it is obvious that perpetrators can be both men and women. However, it is worth mentioning that the fact that criminal offenses are not gender specific in some criminal legislations is a result of legal evolution and a change of perception about the victim (for instance sexual violence only recently became non-gender specific in many countries, while just a few years ago only a man could perpetrate sexual violence and only woman could be a victim). Additionally, scholastic grounds for different understanding of women in the world of crime was set a long time ago, by Cesare Lombroso. Even though nowadays many of his findings are under criticism, it was him who is touted as the first scholar to write about female crimes (Becky, 2019). He is well known for his book "The Female Offender" (1895), where he defined the physical abnormalities that would predestine girls to be criminals from birth (Adler et al., 1991). Consequently, with this theory (no matter how critical is) non-gender specific vision of perpetrator was created.

### **2.1. The Perception About Women in The World of Crime**

So, what made societies in the world think for years that women were not capable of committing the same crimes as a man and that men are the ones who mostly perpetrate them? Until the 1970's, "females who deviated from expected roles were viewed as morally corrupt, hysterical, diseased, manipulative, and devious" (Simpson, 1989) and overall, as exceptions from the rule. Adler et al. (1991) confirmed the existence of that approach by stating that society "tended to view female offenders as misguided children who are an embarrassment rather than a threat to society".

One of the reasons of that understanding might be the fact that women commit a minority of the crimes (Tripković, 2018), so they are not often mentioned by the media in correlation to crime. Heidensohn (2010) explained the phenomena through the *concept of double deviancy* and stated, "that it is the appearance of low participation in 'deviant' activities that accounts for the neglect of the criminalized female experience from the criminological imagination; due to this perceived low participation,

criminalized women are not constructed as of pressing concern for legislators”.

Pollack coined the *chivalry hypothesis* in 1950 with the idea that “females are treated leniently by the criminal justice...”, because the main subjects in the criminal justice system are “...male and have a gracious attitude toward women” (Criminal Justice Illuminated, 2020), while Wornall (1990, through Tripković, 2018) explains this same phenomenon through the *theory of gender contract*. McWilliams (n.d) explains gender contract as “the systematic organization of a gender system that is constructed, controlled and reinforced by relations between men and women and articulated into daily activities”. So, in that kind of setting, women are usually perceived as the ones who take care of domestic matters such as the family, children, home, and, in general, not aggressive. Their possible breach into the criminal zone is an excess of the mentally deranged women, not a matter of a free will.

One of the reasons for this superficial perception of women’s role in crime, is their previous lack of freedom. In the past, women were under-active in the public sphere, so the opportunities for perpetration of crime was less (Aebi et al., 2014). With an increase in their freedoms (right to choose, work, education, etc.), their opportunities for the crime proportionally increased as well. Killias (2002, through Aebi et al., 2014) also finds that with an increase in women’s participation in the work force, the opportunity for committing the crime increases. This correlation is also true with the economic independence of women. Steffensmeier and Allan (1996) and (Aebi et al. 2014) suggest a few factors to explain the gap between man and women in their participation in crime: gender differences, moral development, social control, physical strength and aggression, and sexuality.

All these theories are part of feminist criminology, which has merit in making “women visible in the study of crime” (Heidensohn, 1995). Until its appearance, Simpson (1989) reminds us that it was Daly who suggested that studies of crime and the justice process were “shaped by male experiences and understandings of the social world”.

## **2.2. Brief Overview of the Extent of the Involvement of Females in Crime in the World**

Presently, there is no room for the discrimination of women even in the crime-related discourse let alone the use of the stereotypes about women,

and it is important to wonder to what extent in the practice do women commit criminal offenses compared with their male counterparts. Official statistical data confirm that among criminal offenders there are women as well. Heiskanen and Lietonen (2016) noted an interesting phenomenon in the global offender rates by gender, while the rate for men decreased by 9% between 2004 and 2013, women saw a 2,7% increase during the same time frame. They noted that the highest female crime rates within total crime are present in "the USA, Korea, New Zealand, Guyana, Grenada, and Botswana". The European Sourcebook of Crime and Criminal Justice Statistics (Aebi et al., 2016) shows that in Europe, within the 26 countries analyzed, in comparison of number of male and female offenders per state per 100 000 people, in crime in general, the share of female offenders is the lowest in Albania (4,3%), while the highest is in Germany (25,4%). Other countries with a high rate of female offenders are Sweden (20,3%), Greece (20,2%), Italy (17,5%), and Hungary (17,3%).

Typo-logically women commit various types of criminal offenses. According to Aebi et al. (2014), in the USA, women often commit property crimes like burglary and robberies. Some women are even condemned as serial killers and they have been involved in the most brutal and horrendous killings in history. This is not just a mistaken occurrence leading to murder, it is a well thought through, planned, and executed killing of children, old people, women, and men alike. According to Rothschild (2019), seventeen (17) States in the United States of America (USA) have 51 women prisoners on death row as of 2019, as a form of capital punishment. These women have been involved in murder, conspiracies, torturing others, killing children, and a host of other serious crimes (Rothschild, 2019). According to Aebi et al. (2018), in the USA about "a quarter of arrested persons are women" and for example in 2015 "police arrested almost 5 million men and around 1,8 million women".

As for Europe, The European Sourcebook of Crime and Criminal Justice Statistics (2014) shows a very high propensity of women in the perpetration of homicides in Italy (in total crime per 100 000 people, women commit 54,1% of all homicides), while the lowest is in Albania (1,9%). Women show propensity for property crimes as well, as their share of participation as active subjects in property crimes is high compared with men. For crimes involving theft, the rates of female offenders are highest in Italy (23,3%), while the lowest is in Kosovo (2,3%); the highest rate of female perpetration

in money laundering is Hungary (66%). The same source shows that women commit sex offenses as well, with highest rate (compared to men) is in Greece (29,8%), while the lowest rate is in Albania, at zero convicted women for the observed period.

### 3. Women and War Crimes

What about women's share in the perpetration of war crimes? The rates of war crimes usually are not found in the regular Crime Rates Yearbooks, since for this type of crime, an essential element of the crime requires the country to be at war. It can be perpetrated only within armed conflicts. Therefore, the data about the number of war crimes and the number of female offenders is collected in correlation with a particular armed conflict. And if we investigate the history of warfare, it can be said that women have generally contributed to war crimes across the globe, by playing different roles and for different motives. Smeullers (2015) notes that there is only about 1% of women of all the people convicted by international criminal courts and tribunals for war crimes. This raises the question of whether the rate is a result of a low share of female war criminals in armed conflicts or if the tribunals focus mostly on those who are in leadership positions, and as Smeullers (2015) correctly notes, women are underrepresented in leadership roles in armed conflicts. Supporting that statement is the fact that there were no women tried in the International Military Tribunal for the Far East (Delpa, 2015). The fact that women are not afforded the opportunity to hold leadership roles in an armed conflict couples with the general understanding of the lack of capability of women to perpetrate crime, resulted in the widespread perception among the general population that women do not usually commit war crimes.

Contrary to that perception, which was formulated based on antiquated stereotypes about women, there are many specific arguments that prove that women do participate in warfare and do commit war crimes. History offers them to us, and we should not be selective in understanding it.

#### 3.1. Roles of Women in Warfare - Opportunity to Become War Criminal

Smeulers (2015) correctly concludes her previously mentioned thought by predicting that women will be included in higher rates as perpetrators of war crimes as they improve their position and rights in politics and leadership. That indicates that the role of women in warfare is directly

correlated with the participation women in perpetration of war crimes. One gives an opportunity to the other.

Social and psychological theories in the past century were based on the social roles of males and females with male as ones who are fighters and providers and female as ones who are taking care of home. It was with that understanding of the differences between men and women which resulted with an inaccurate perception of women not perceived as criminals or able to be war criminals. That stereotype was dominant (Delpla, 2015) for most societies, yet it varied in some cultures. Even before the feminist movement and the improvement of the role of women in society, back in the antiquity period, it is possible to find examples of the active role of women in warfare. In fact, throughout the history of warfare until today, those roles were diverse.

Hughes (2018) mentions few examples of women who were well known warriors in the antiquity: Zenobia was the Warrior Queen of Syria (240 – c. 275 AD) (*History queen*, n.d); Tomyris (fl. 530 BC) was the queen of Massagetae, an ancient Eastern Iranian nomadic tribal confederation who fought revengeful war against the Persian King (*ehistory*, n.d); powerful military leader Fu Hao (d. c. 1200 BC) from ancient China's Shang Dynasty commanded over 13,000 soldiers (*encyclopaedia*, n.d); Queen Artemisia of Cynane (c. 358 – 323 BC), accompanied the Macedonian army on a campaign alongside Alexander the Great (*Cynane*, n.d); Boudicca (d. 60/61 AD) was the Queen of the British Celtic Icenii tribe, accompanied with her army, destroyed three Roman towns: Camulodinium (Colchester), Verulamium (St. Albans), and Londinium (London) (*Boudicca*, n.d); and TriệuThị Trinh, commonly called Lady Triệu (ca. 222 – 248 AD), who was the warrior who fought hard to bring freedom to the Vietnamese (*TreuThi*, n.d).

History shows us that not only the perception about women in warfare has changed, but also warfare itself has changed. Smeulers (2015) describes warfare as a mixture of “war, organized crime, and massive violation of human rights”. That evolution opened the possibility for women to assume different roles in warfare a part of being warriors. Women played an important role in World War I as workers in the military industry and as nurses and cooks. Women were co-combats, as well. By the end of the World War II, in Germany, there was about 100 000 women in the air force (Goldstein, 2001) and a few thousand of them were contributing to the war as administrators.

During World War II, women were also guarded and tortured. Kershner (2010), in her article, "Women's Role in Holocaust May Exceed Old Notions", stated that men were the main machinery for the Nazi killings. However, women also participated in the holocaust, which she describes as naturally abnormal because it refutes the notion of a normal female behavior. There were 5,000 women guards, constituting ten percent of all camp guards used during the Nazi holocaust. Women like Ilse Koch and Irma Grese were among the notorious camp guards during the World War II. Their punishments for their role in the holocaust were a conviction for murder and sentenced to hanging to death. Also, Erna Petri was sentenced to life imprisonment after the holocaust for shooting six Jewish children to death in Nazi-occupied Poland. She admitted to the crime and mentioned that they were between the ages of six to twelve years old. Her main justification for her actions was to prove herself to the men, who were mostly the ones carrying out the killings. It is surprising to note that some of the women, who directly participated in the killing and torturing during the holocaust, threw big banquets near Ukrainian forests where mass shooting took place, to refresh the men who were killing. There is also the case of a woman named Altvater Zelle who killed children in the hospital by throwing children through the windows and by smashing their heads against the wall. Her trial was surrounded with controversies, so she was initially acquitted. The case was re-opened when one survivor testified against her in court (Kershner, 2010). These are the only examples of females convicted of perpetrating war crimes in Germany.

Apart of being warrior, co-combat, worker, guardian, nurse, cook, etc., intellectual women played an important role in inciting war crimes or making them happen, which, based on understanding of the meaning of "perpetration" is also a trigger for criminal responsibility. The contribution of the 'ordinary and intellectual women' in the Rwandan genocide cannot be underestimated. In Rwanda, the 'ordinary women' committed the crime physically but were tried by the Gacaca court. Meanwhile, the 'intellectual women' who were the master-minders behind the crimes of the 'ordinary women' were tried as well. (Hogg, 2010). However, Pauline Nyiramasuhuko is so far the only women being convicted for war crimes in Rwanda, "for having directly incited militias to rape and murder Tutsi women" (Delpla, 2015). However, the role of 'ordinary women' can't be denied either. During the genocide in Rwanda, Hogg (2010) reported from her numerous interviews that, most women perpetrated crimes under the

pretence of being afraid for their own lives and a lack of trust among their family members. They claimed the soldiers forced them to reveal the hiding places of Tutsis. Lack of trust was so obvious that a woman with four Tutsi children poisoned them all because she thought poisoning was a much softer way to die compared to the use of machete by the Hutu soldiers.

Furthermore, Trisko Darden et al. (2019) reminds us of the role of women in ISIS as recruiters and propagandist. There are “about 1780 foreign women who joined the ISIS”, and “in Boko Haram, 56% of suicide bombers are women” (Trisko Darden et al., 2019).

Finally, Smeuler (2015) classifies 10 roles of women in warfare within which they (might) commit war crimes. Those are: bystanders; administrative and supporting personnel; cheerleaders; criminals; prison and camp guards; interrogators; killers and murderer; sex offenders and political leaders and instigators. All these actions lead to criminal responsibility.

However, even though there is a visible diversity of roles of women in warfare, based on the numbers of convicted female war criminals, it can be said there is still “masculine domination” (Delpa, 2015) and women are underrepresented in the sphere of war crimes.

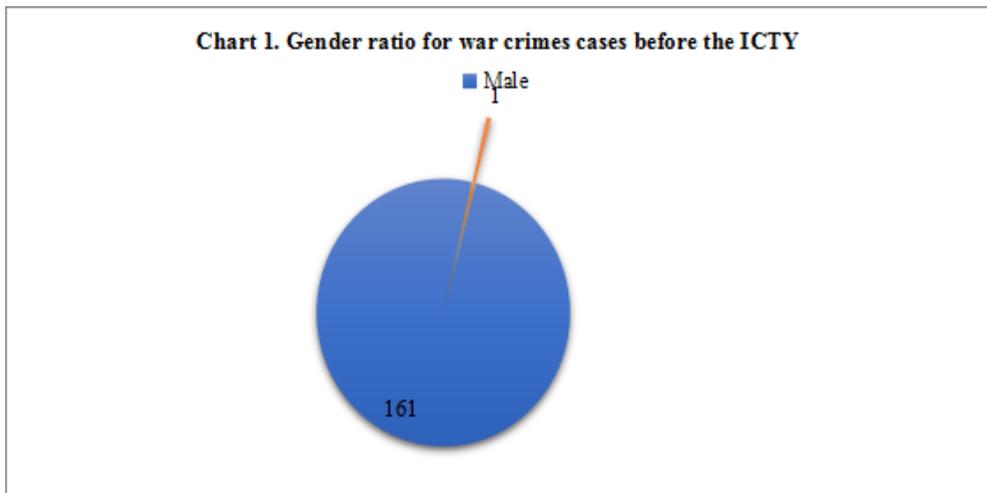
#### 4. Women as Offenders of War Crimes in Bosnia and Herzegovina

An armed conflict that took place in Bosnia and Herzegovina from 1992-1995, was resolved with the Dayton Peace Agreement. The conflict resulted in “97,207 deaths, 40% of whom were civilians” (Research and Documentation Center, 2012) and thousands of injured, traumatized, mass raped, illegally detained in the concentration camps, thousands becoming refugees and displaced persons. On May 25, 1993, during the armed conflict, the UN Security Council passed *Resolution No. 827*, establishing the International Criminal Tribunal for Yugoslavia with jurisdiction to “prosecute persons responsible for serious violations of international humanitarian law committed in the territory of the former Yugoslavia between 1 January 1991 and a date to be determined by the Security Council upon the restoration of peace and to this end to adopt the Statute of the International Tribunal” (UN Resolution 827, 1993). In 2002, at the national level, the Court of Bosnia and Herzegovina was established with one of its jurisdictions, to prosecute criminal offenses prescribed by the Criminal Code of BH and “...to issue guidance on the application of the

substantive criminal law of Bosnia and Herzegovina falling within the competence of the Court on genocide, crimes against humanity, war crimes and violations of the laws and practices of warfare and individual criminal responsibility related to those crimes..." (Art. 7 (3) Code on Court of Bosnia and Herzegovina, 2002). Within the Court, there is the War Crimes Division where cases of war crimes are being tried.

In this part of the paper, all the final verdicts rendered by the International Criminal Tribunal for Yugoslavia (hereinafter "ICTY") and the State Court of Bosnia and Herzegovina will be analyzed to identify cases of women as perpetrators of war crimes.

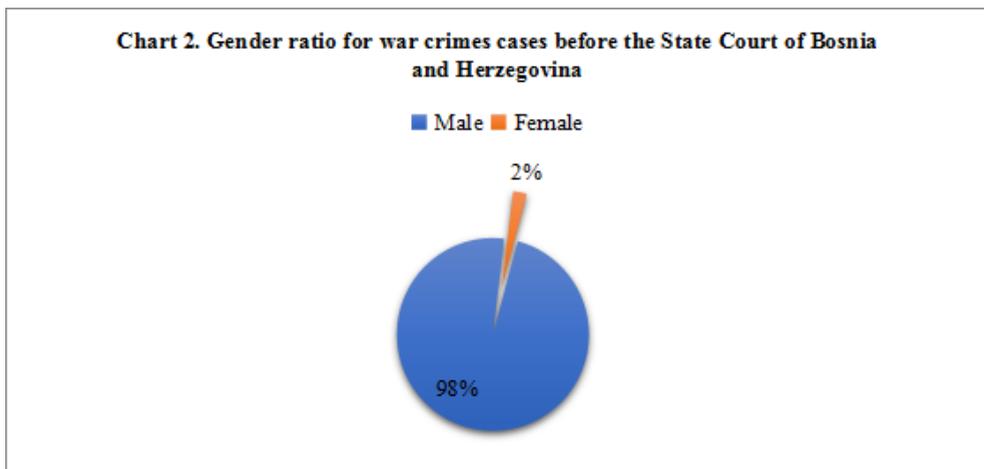
Based on the analysis of the database of the ICTY and rendered verdicts (ICTY Cases, n.d. and ICTY Judgment List, n.d), it can be concluded that out of 161 convictions there is only one conviction of a woman for war crimes (see Chart 1). That is the case of Biljana Plavšić (Case No. IT-00-39&40/1-S, verdict from 27 February 2003).



Based on the statistical figures of the State Court of Bosnia and Herzegovina (Statistics of the Court of Bosnia and Herzegovina, 2020), at the Division for War Crimes from the time of its establishment until present there have been a total of 234 finalized cases. Within those cases, there are 254 convictions of males and 6 convictions of female perpetrators of war crimes (Statistics of the Court of Bosnia and Herzegovina, 2020). Based on the analysis of all verdicts, those are these cases: Bašić S1 1 K 018557 17 Kri;

Handanović S 1 1 K 009162 12 Kro, Kamerić S1 1 K 010132 15 Krž, Terzić S1 1 K 005665 11 KrI, Grubišić Fejzić S1 1 K 009124 12 Kri; Veseli S1 1 K 020147 17 KrI) and these perpetrators (See Chart 2):

- Azra Bašić;
- Rasema Handanović;
- Indira Kamerić;
- Albina Terzić;
- Marina Grubišić Fejzić; and
- Elfet Veseli.



\* Created by authors, based on the finalized verdicts (Plavšić IT-00-39 & 40/1; Bašić S1 1 K 018557 17 Kri; Handanović S1 1 K 009162 12 Kro, Kamerić S1 1 K 010132 15 Krž, Terzić S1 1 K 005665 11 KrI, Grubišić Fejzić S1 1 K 009124 12 Kri; Veseli S1 1 K 020147 17 KrI), at [sudbih.gov.ba](http://sudbih.gov.ba)

This data shows us that in the case of the armed conflict in Bosnia and Herzegovina, as well, women are underrepresented as war criminals. The reasons for that might be many: from the ones fitting in the *theory of social contract*, to the fact that not many women actively participated armies (Balon, ed., 2014) and in the war crime as direct perpetrators nor as leaders.

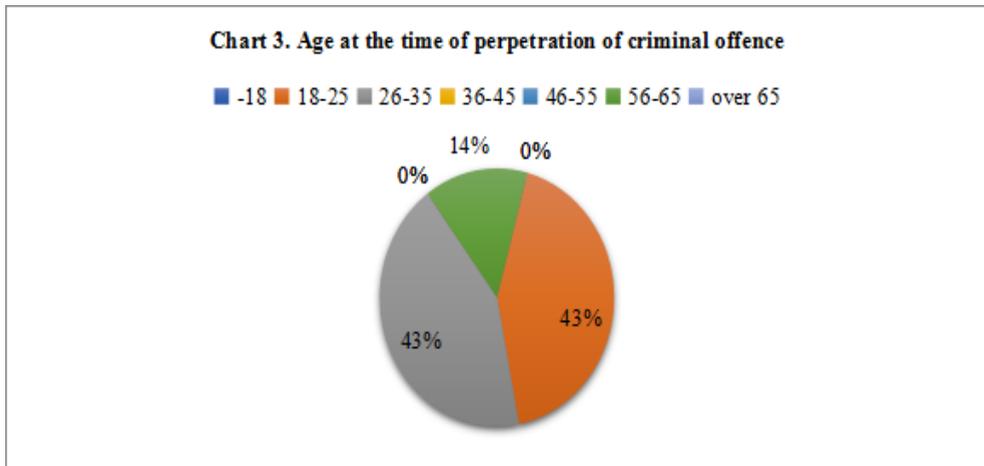
### Profile of perpetrators

To this article, the profiling of women perpetrators was based on the analysis of all the finalized verdicts through these main profiling criteria:

age, occupation, level of education, prior convictions, role during the war, characteristics of their behavior identified through mitigating and aggravating circumstances, and sentences.

*a. Age*

Women perpetrators of war crimes during the armed conflict in Bosnia and Herzegovina, from 1992 through 1995, belong to just three different age groups (see Chart 3). Only one belongs to the age group of 55-65, being 62 years old at the time of the perpetration of the criminal offense. Three of them belong to age group 18-25, one was 20 years old, one was 21 years old, and one was 25 years old at the time they perpetrated the criminal offense. Finally, the remaining three women perpetrators belonged to the age group 25-35, one was 30 years old, one was 32 years old, and one was 33 years old in *temporis comici*.

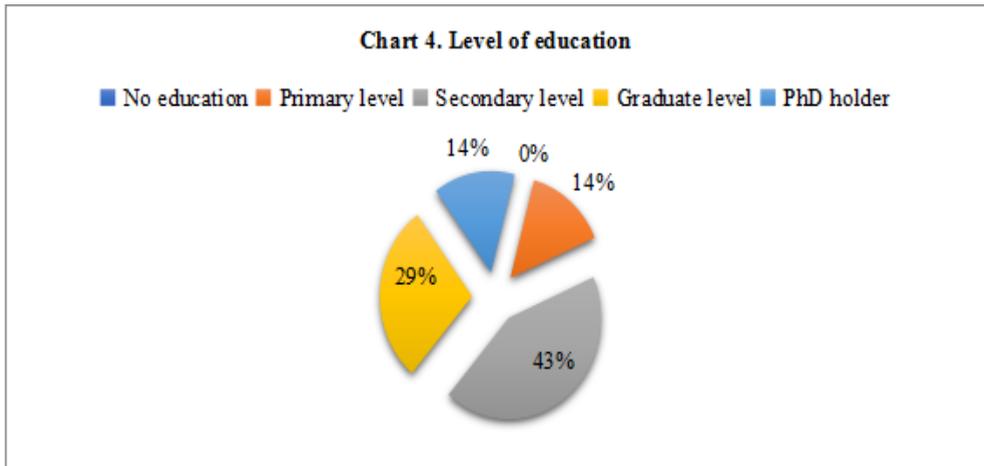


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Therefore, it can be concluded that most of the women perpetrators of war crimes committed them in young age.

### b. Education level

Since there is only Ph.D holder (Plavšić), two perpetrators with undergraduate studies, three with secondary level of education and one housewife (Grubišić Fejzić), it can be said that in average most of the perpetrators had secondary level education (see Chart 4). All of them were respectful members of their societies before the armed conflict.



\*Created by authors, based on the finalized verdicts: (Plavšić IT-00-39 & 40/1; Bašić S1 1 K 018557 17 Kri; Handanović S1 1 K 009162 12 Kro, Kamerić S1 1 K 010132 15 Krž, Terzić S1 1 K 005665 11 KrI, Grubišić Fejzić S1 1 K 009124 12 Kri; Veseli S1 1 K 020147 17 KrI).

### c. Occupation

Among seven women perpetrators of war crimes who were tried before the ICTY and the State Court of Bosnia and Herzegovina, there were two lawyers, one nurse, one forest technician, one housewife and one university professor. Data for one perpetrator was not possible to be retrieved.

### d. Prior conviction and remorse

None of the offenders had prior convictions. In overall it can be said that they didn't have criminal past, not they were problematic members of the society.

Among the analyzed cases, there is one case where the perpetrator pleaded guilty and showed remorse (Plavšić), one case where there was a plea agreement and the perpetrator apologized to family members of

victims (Handanovic), while in all the remaining cases the perpetrators pleaded not guilty and did not take responsibility for the crimes which they were prosecuted. Moreover, Marina Grubišić Fejzić identified herself as a hero since, according to her, she did what most of the men were not able to do and does not believe that she is a war criminal (Priča, n.d).

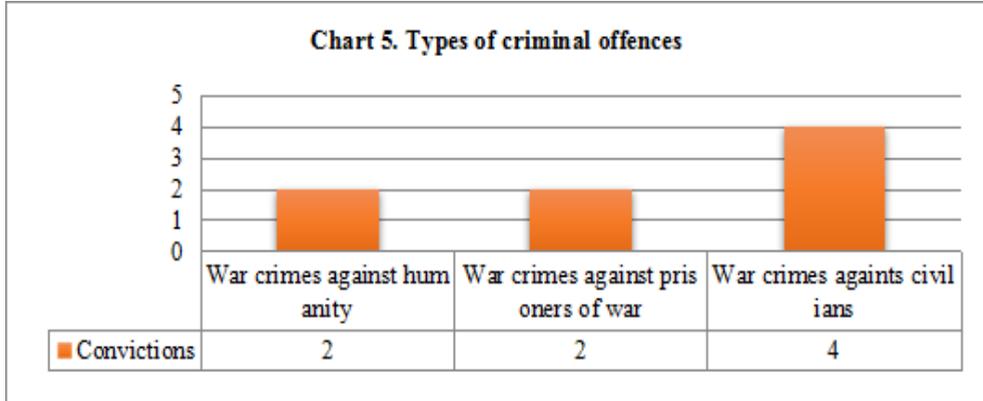
*e. Status of offenders in the wartime*

Among all convicted persons, Biljana Plavšić is the only one of them who is the example of the indirect mode of perpetration (Campbell, 2007). She, as an intellectual woman, was “a member of the collective and expanded Presidencies of Republika Srpska” (case IT-00-39 & 40/1). She “was not a physical participant in the criminal conduct, but was charged as a member of a joint criminal enterprise and for her superior responsibilities” (Campbell, 2007). And interestingly, she is the only female usually being scholastically presented in scientific papers as the war criminal from Bosnia and Herzegovina. Most probably because she was the only one being convicted before the ICTY. When it comes to other convicted female war criminals in Bosnia and Herzegovina, they were active members of armies distributed at the territory of Bosnia and Herzegovina. Azra Bašić was a member of the 103<sup>rd</sup> Croat Defense Council Brigade. Rasema Handanović was a member of the Special Detachment for Special Purposes Zulfikar of the Supreme Command staff of the Army of Republic of Bosnia and Herzegovina. Indira Kamerić was a member of 101<sup>st</sup> Bosanski Brod Brigade of Croat Defense Council. Albina Terzić was as well a member of Croat Defence Council, together with Marina Grubišić Fejzić who was a member of HOS and guardian of the army prison “Dretelj”. Elfet Veseli was a member of the sabotage platoon of the Command of the Joint Units of Liplje. Based on these facts, and having in mind that four out of seven offenders were members of Croat Defense Committee, it can be concluded that most of the women war criminals were members of that Committee.

*f. Criminal offenses*

The types of war crimes committed by these perpetrators are diverse. Biljana Plavšić and Marina Grubišić Fejzić were convicted for crimes against humanity, while Rasema Handanović was convicted for war crimes against prisoners of war. The rest of the women perpetrators were found guilty of war crimes against civilians. Along with being convicted for war

crimes against civilians, Azra Bašić was convicted for war crimes against prisoners of war (see Chart).



*g. Actions of criminal offense*

Based on the established facts from the analyzed cases, perpetrators committed these actions:

**Biljana Plavšić** (case No. IT-00-39&40/1-S) as described by Smeulers (2015) was “a very ambitious woman who probably enjoyed the power and being in the limelight..”, who was “...cold and calculated”, and “deliberately took her position and acted consciously”. Before the war she was established scientist, during the war she got involved in politics and in many criminal activities. As stated in the verdict, “between 1 July 1991 and 30 December 1992, was acting individually and in cooperation with others in a joint criminal enterprise, planned, instigated, ordered and aided and abetted persecutions of the Bosnian Muslim, Bosnian Croat and other non-Serb populations of 37 municipalities in Bosnia and Herzegovina” (<http://www.un.org/icty>).

More specifically, she was found guilty for “serving as co-President, thereby supporting and maintaining the government and military at local and national levels through which the objective was implemented; for “encouraging participation by making public pronouncements that force was justified because certain territories within Bosnia and Herzegovina were Serbian by right and Serbs should fear genocide being committed against them by Bosnian Muslims and Bosnian Croats” (<http://www.un.org/icty>); and for inviting and encouraging paramilitaries from Serbia to assist Bosnian Serb forces in effecting ethnic separation by force.

In **Azra Bašić's** case evidence has presented that "between 26 April and early May 1992, on the premises of the JNA Dom in Derventa and in the territory of the Polje village, Municipality of Derventa, where Serb civilians and a prisoner of war from the territory of the Derventa municipality were detained, alone or together with other members of the Croatian Army and the HVO, participated in the murder, torture and inhumane treatment, infliction of great suffering and injuries of the body integrity and violation of health" (verdict S1 1 K 018557 17 Kri, 2018).

Actions that were committed by her show immense cruelty and brutality. She is convicted for these individual actions as well:

- She initiated the beating of Blagoje Đuraš, and according to Paragraph 1 of the Verdict (S1 1 K 018557 17 Kri, 2018)
 

*"...fell on the floor and partially leaning against the wall, and then ordered Ostoja Šarčević and Radojica Garić to lift the beaten Blagoje Đuraš, and after Ostoja and Radojica lifted Blagoje to their knees, she approached Blagoje Đuraš with a knife in her hand and stabbed him in the neck and killed him, and then turned to other prisoners present .....and said 'May the duke breathe easier from now on'";*
- She inflicted severe physical and mental pain on civilians by
 

*"... ordering them, together with other members of the HV and HVO known to her, to take off their clothes and be naked to the waist, barefoot, to eat the Yugoslav dinars they had with them, to kiss the Croatian flag, to walk barefoot on the floor covered with broken glass; ordered Stanimir Pijetlović to walk on broken glass on the floor while she rode him; ordered members of the HVO known to her to take the detained civilians in front of the House for alleged shooting, and ordered Stanimir Pijetlović, Zoran Radišković, Mile Kuzmanović and others to be taken out, which the soldiers did and then lined up the civilians against the wall of the JNA House, and fired automatic rifles at their heads; ... she was inflicting severe mental pain to them by personally forcing the imprisoned civilians to lick the blood from the boots and body of the murdered Blagoje Đuraš; and after, asking Čedo Prodić if he had children and when he said he had, she replied: "Now you will not have any more". She ordered him to spread his legs and then kicked him hard in the genital area with a military boot, which caused Čedo severe pain" (par. 2, verdict S1 1 K 018557 17 Kri, 2018).*
- She carved a cross on the back of one civilian, put salt on the wound, made him eat the salt and hit him hard that he fell on the floor (par.3, verdict S1 1 K 018557 17 Kri, 2018);

- She hit a civilian in his head and genitals (par. 4, verdict S1 1 K 018557 17 Kri, 2018);
- She inflicted severe physical and mental pain on a civilian by ordering him to lower his four-legged friends to the floor and then rode him and ordered him to walk on all fours on a floor covered with broken glass; kicked him in the area of his mouth, broke his teeth and injured his lip, and then hit him with a hard object in the head area (par. 5, verdict S1 1 K 018557 17 Kri, 2018);
- She carved cross and letter “S” with a tip of knife at back and forehead of one civilian (par. 6, verdict S1 1 K 018557 17 Kri, 2018) and carved cross and cut another civilian in the region of throat (par. 7, verdict S1 1 K 018557 17 Kri, 2018);
- She beat another civilian (par. 8, verdict S1 1 K 018557 17 Kri, 2018);
- She inflicted severe physical and mental pain to a civilian by beating him with her feet, hands, baseball bats, butts and barrels of weapons, and after the victim fell to the floor, she together with other soldiers continued to tread him and jump on him (par. 9, verdict S1 1 K 018557 17 Kri, 2018);
- She inflicted three stab wounds into a civilian and beat him (par. 10, verdict S1 1 K 018557 17 Kri, 2018) and threatened one civilian to amputate his genitals and then amputated his left ear (par. 10, verdict S1 1 K 018557 17 Kri, 2018);

**Rasema Handanović** was charged and convicted for participating in the attack on the village of Trusina, Konjic municipality, and within that attack she participated in the execution-style killing of several prisoners of war and civilians. She “participated in the summary execution of the lined-up members of the HVO” and “...in the execution of several prisoners of war and civilians” (verdict in case S1 1 K 009162 12 Kro, 2012).

**Indira Kamerić** took part in the physical and mental torture and the inhumane treatment of civilians and prisoners of war. The verdict specifies that she was perpetrating these actions:

- In one of the rooms at the Polet Stadium in Bosanski Brod, together with another unidentified woman and other members of the HVO, she participated in the psychological and physical abuse of prisoners, Nukić Hazba and IK-3. She attempted to force her to admit being a Serbian spy and when the injured party did not admit, the 4 members

of the HVO, who were present, started beating her with batons, rifle butts and kicked her on all parts of her body. She then ordered prisoner, IK-3, to be brought to the room, and when they brought him, the HVO members present forced him to sit on a chair, and ordered Nukić Hazba to sit on his lap, and then they ordered him to squeeze her chest and genitals hard, to hit her on the back, and to tear her underwear and put it in his pocket, and then she slapped Hazba twice and then ordered her to be taken to a room on the ground floor (verdict in case S1 1 K 010132 15 Krž, 2015);

- She also physically abused one civilian, who she beat many times (verdict in case S1 1 K 010132 15 Krž, 2015);

**Albina Terzić** was well known for her brutality. She was performing inhuman activities towards civilians of Serb nationality. She was found guilty for perpetrating following criminal actions amounting to war crimes against civilians:

- Beating a civilian with police bat;
- Humiliating and slapping one civilian;
- Threatening Serb civilians with a dog in a building where they were illegally placed and forced them to stand one behind the other and sing "ustaša" songs until many of them fainted;
- Organizing and simulating camp wedding and laugh at those individuals, made fun of them and violated their dignity (verdict in case: S1 1 K 005665 11 KrI, 2012);

**Marina Grubišić Fejzić** was found guilty for participating in the physical and sexual abuse of male and female prisoners in military barracks hangar "Bruno Bušić" in Dretelj and for physically assaulting prisoners and making them perform oral sex (verdict in case S1 1 K 009124 12 Kri, 2015);

**Elfet Veseli** was found guilty of war crimes against civilians since it was proved that she killed a 12-year-old boy of Serb nationality by firing a projectile at his head from close range (verdict in case: S1 1 K 020147 17 KrI, 2019).

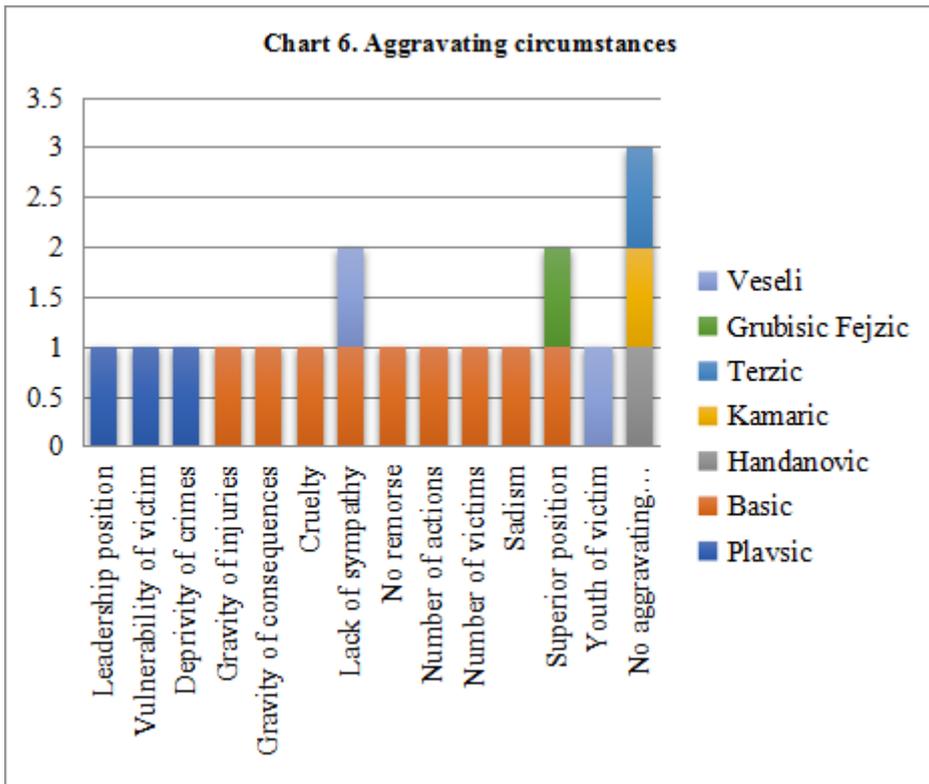
\*\*\*

All these descriptions clearly show us that these convicted war criminals had perpetrated many of actions of war crimes in a cruel way, and above mentioned lack of remorse for those actions is a combination easy

recognizable in cases where man are war criminals well. So even though they are lesser in quantity, the quality of actions done doesn't differ too much from the one commit by man.

*h. Aggravating circumstances*

The final verdicts offer us information about the circumstances of each case that the court has labeled as qualifying.



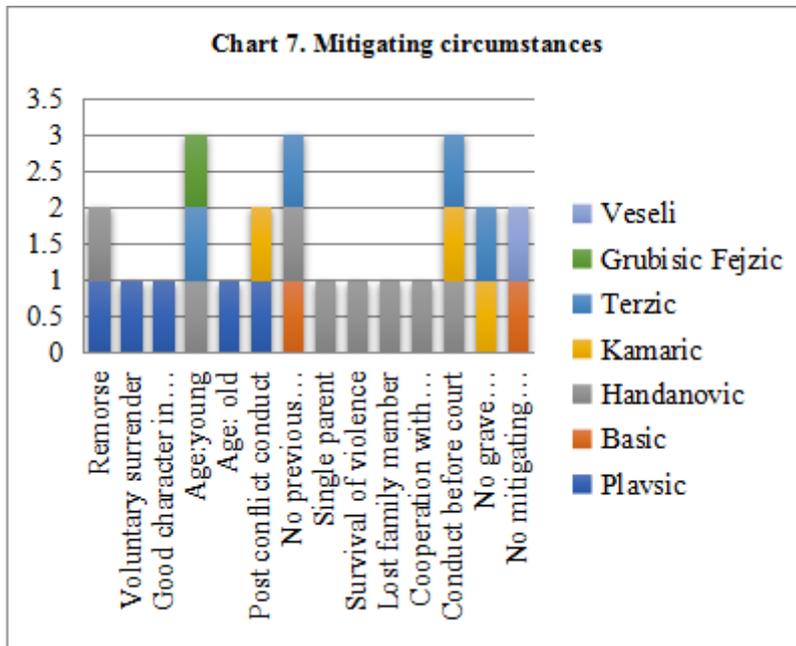
\*Created by authors, based on the finalized verdicts

The above presented data (chart 6) retrieved from the final verdicts (Plavšić IT-00-39 & 40/1; Bašić S1 1 K 018557 17 Kri, par. 409; Handanović S 1 1 K 009162 12 Kro, Kamerić S1 1 K 010132 15 Krž, Terzić S1 1 K 005665 11 KrI, Grubišić Fejzić S1 1 K 009124 12 Kri, par. 935; Veseli S1 1 K 020147 17 KrI, par. 279) shows us which characteristics of the personality of the perpetrator, the type of victim, and the act of the perpetration, which were found to be aggravating circumstances that made the criminal sanction more severe. In

three cases (Terzić, Kamarić and Handanović), the Court found no aggravating circumstances. Most of the aggravating circumstances were found in the case of Azra Bašić, which was expected, taking into consideration cruelties shown in the perpetration. Plavšić's case is an example of a case where a leadership position that she held at the temporis criminalis was found to be an aggravating circumstance.

*i. Mitigating Circumstances*

On other hand, in some of the cases the courts found mitigating circumstances that had an impact on their sanctions (see chart 7).



\*Created by authors, based on the finalized verdicts

It is possible to conclude that the young age of perpetrators, lack of previous convictions, and good behaviour before the court were found to be frequent mitigating circumstances in these cases while lack of mitigating circumstances was found in only two cases (Plavšić IT-00-39 & 40/1; Bašić S1 1 K 018557 17 Kri, par. 410; Handanović S1 1 K 009162 12 Kro par.76, Kamarić S1 1 K 010132 15 Krž par. 237, Terzić S1 1 K 005665 11 KrI, par. 225; Grubišić Fejzić S1 1 K 009124 12 Kri, par. 939; Veseli S1 1 K 020147 17

KrI.). Most of the mitigating circumstances were found in the case of Rasema Handanović (Court of BH) and the case of Biljana Plavšić (ICTY).

*j. Criminal Sanctions*

Regarding the type of sanctions imposed on these offenders, it is visible that all 7 women offenders were punished by imprisonment as a type of sanction. The longest term of imprisonment was imposed on Azra Bašić (14 years), then Elfet Veseli (13 years), Biljana Plavšić (11 years), Rasema Handanović (5 years and 6 months), Marina Grubišić Fejzić (5 years) and Indira Kamerić and Albina Terzić (first degree verdict 5 years, while second degree verdict reduced sanction to 3 years).

## **5. Conclusion**

Even though there exist evidence of women's participation in war from antiquity, the stereotype of women being weak and incapable of fighting in a war was the dominant opinion for centuries. The same can be said of the myth that women do not commit war crimes. The general perception of women as a perpetrator of a crime was not too different, as it was perceived that man are the ones who prevail as perpetrators of crimes, while women's place in the criminal zone wasn't understood to be threatening to society. The reality was different, as showed in this article through real life cases and argumentative scholastic explanations. Not only are women active as perpetrators in the general crime, but are perpetrators of war crimes as well. The truth is that the rates of their participation are lesser than men's but criminal offenses they commit can't be neglected. An interesting phenomena of a nowadays is presented - in a way that the rates of crimes perpetrated by man in world are decreasing, while ones perpetrated by women are increasing. As criminals, women show propensity for property crimes. When it comes to war crimes, the quantity of convicted women for war crimes until now is 1%. It can be expected that the quantity of female war criminal will increase as their role as leaders in warfare increase as well, since the studies show that courts and tribunal mostly focus in trialing ones on leading positions.

The fact that some women are war criminals was confirmed through our study as well. Namely, seven women had been convicted as war criminals from the armed conflict in Bosnia and Herzegovina. Only few of them showed remorse, while brutality is easily found in their actions. None

of the women had previous convictions. Most of them involved in these war crimes were very intelligent women who acquired educational levels ranging from secondary level to PhD. It will not be out of order to assume that only a few of them would have the tendency to do the crimes again, if given the opportunity, especially taking into consideration that their criminal sanctions are in the middle range of the sanctions prescribed and that they were proud of the actions that they have committed and showed no remorse. However, when compared with the total number of cases and convictions, it can be concluded that even though women do perpetrate war crimes, including very violent as, they are not the prevailing gender among perpetrators.

### List of References

- Adler Freda et al. (1991 and newer ed.) *Criminology*. USA: McGraw-Hill.
- Aebi, Marcelo F. et al. (2014). *European Sourcebook of Crime and Criminal Justice Statistics 2014*. United Nations European Institute for Crime Prevention and Control.
- Allison, M. (2013). 10 Horrible Crimes Committed by Children. Retrieved from <https://listverse.com/2013/07/25/9-horrible-crimes-committed-by-children/> on 04/09/2020.
- Barnett, T. (2020). *What is a Perpetrator?* Retrieved from <https://www.wisegeek.com/what-is-a-perpetrator.htm> on 04/09/2020.
- Burgess, A. W., Regehr, C. and Roberts, A. R. (2010). *Victimology: Theories and Applications*. Jones and Bartlett. Massachusetts, USA.
- Cambell, Kirsten (2007). The gender of transitional justice: law, sexual violence, and the International Criminal Tribunal for the former Yugoslavia. *The International Journal of Transitional Justice* 1(3): 411-432.
- Code on Court of Bosnia and Herzegovina* (Official Gazette of BH, No. 29/00, 16/02, 24/02, 3/03, 37/03, 42/03, 4/04, 9/04, 35/04, 61/04, 32/07, 49/09, 97/09).
- Delpla, Isabelle. (2015). "Women and International (Criminal) Law." *Clio* (39). doi: 10.4000/cliowgh.546.
- Dictionary.com, LLC. (2020). *Perpetrator*. Retrieved from <https://www.dictionary.com/browse/perpetrator> on 04/09/2020.
- Gelsthorpe, L. (2020), "Feminist Perspectives in Criminology: Early Feminist Perspectives", Walklate, S., Fitz-Gibbon, K., Maher, J. and McCulloch, J.

- (Ed.) *The Emerald Handbook of Feminism, Criminology and Social Change (Emerald Studies in Criminology, Feminism and Social Change)*, Emerald Publishing Limited, pp. 17-33. <https://doi.org/10.1108/978-1-78769-955-720201004>
- Goldstein, Joshua S. (2003). *War and Gender. How Gender Shapes the War System and Vice Versa*. Cambridge University Press.
- Heidensohn, Frances. (2010). "The Deviance of Women: A Critique and an Enquiry". *The British journal of sociology*. 61 Suppl 1. 111-126;
- Heiskanen, Markku, and Anni Lietonen. n.d. "A Study On How Men And Women Are Represented In International Crime Statistics." 88.
- History Extra. (2019). *The 'born criminal'? Lombroso and the origins of modern criminology*. Retrieved from <https://www.historyextra.com/period/victorian/the-born-criminal-lombroso-and-the-origins-of-modern-criminology/> on 12/09/2020.
- Hogg, N. (2010). Women's participation in the Rwandan genocide: mothers or monsters? Vol. 92, No. 877. Retrieved from <https://international-review.icrc.org/sites/default/files/irrc-877-hogg.pdf> on 12/09/2020.
- Hughes, T. (2018). *10 Great Warrior Women of the Ancient World*. Retrieved from <https://www.historyhit.com/10-great-female-warriors-of-the-ancient-world/> on 08/09/2020.
- Islam, M. J., Banarjee, S. and Khatun, N. (2014). *Theories of Female Criminality: A criminological analysis*. *International Journal of Criminology and Sociological Theory*, Vol. 7, No. 1, 1-8. Retrieved from <https://pdfs.semanticscholar.org/0ee7/915976a3c9d0286fa71755c47ed03e11081a.pdf> on 28/08/2020.
- Kershner, I. (2010). *Women's Role in Holocaust May Exceed Old Notions*. Retrieved from <https://www.nytimes.com/2010/07/18/world/europe/18holocaust.html> on 12/09/2020.
- Little, B. (2019). *What Type of Criminal Are You? 19th-Century Doctors Claimed to Know by Your Face: The now-debunked "born criminal" theory was highly influential in criminology circles*. Retrieved from <https://www.history.com/news/born-criminal-theory-criminology> 12/09/2020
- Lindsay, K. (2012). *The She-Soldiers of World War One*. Retrieved from <http://ww1centenary.oucs.ox.ac.uk/unconventionalsoldiers/the-she-soldiers-of-world-war-one/> 21/09/2020.

- McWilliams, Grant. n.d. "Understanding Local Variations in Gender Relations Using Gender Contract Theory."
- Meares, T. L. (2001). "Crime and Ethnicity (Including Race)." Pp. 2914–18 in *International Encyclopedia of the Social & Behavioral Sciences*. Elsevier.
- Nangia, V. D. (2010). What makes a woman truly feminine? Retrieved from <https://timesofindia.indiatimes.com/blogs/O-zone/what-makes-a-woman-truly/> on 09/09/2020.
- Petrović, Borislav and Jovašević, Dragan. *Krivično pravo Bosne i Hercegovine I dio (Criminal Law of Bosnia and Herzegovina I part)*. Sarajevo: University of Sarajevo.
- Ranker.com (2020). *The Most Famous Female Serial Killers*. Retrieved from <https://www.ranker.com/list/famous-female-serial-killers/reference> on 12/09/2020.
- Righthand, J. (2011). *The Women Who Fought in the Civil War*. Retrieved from <https://www.smithsonianmag.com/history/the-women-who-fought-in-the-civil-war-1402680/> on 27/08/2020.
- Research and Documentation Center (2012) *Bosnian Book of the Dead*. Sarajevo;
- Resolution of the UN No.827*, Adopted by the Security Council at its 3217th meeting. On the 25 May 1993, retrieved from: <https://www.icty.org/en/about/tribunal/establishment>, on October 9, 2020;
- Rothschild, M. (2019). *Women Currently on Death Row in the United States*. Retrieved from [https://www.ranker.com/list/women-on-death-row/mike-rothschild?ref=rldlsts&li=165902&li\\_source=LI&li\\_medium=desktop-also-saw](https://www.ranker.com/list/women-on-death-row/mike-rothschild?ref=rldlsts&li=165902&li_source=LI&li_medium=desktop-also-saw) on 12/09/2020.
- Simpson, Sally S. (1989). "Feminist Theory, Crime, And Justice\*." *Criminology* 27(4):605–32. doi: 10.1111/j.1745-9125.1989.tb01048.x;
- Smeulers, Alette. (2015). "Female Perpetrators: Ordinary or Extra-Ordinary Women?" *International Criminal Law Review* 15(2):207–53. doi: 10.1163/15718123-01502001.
- Swart, M. (2019). *Explainer: What is a war crime?* Retrieved from <https://www.aljazeera.com/news/2019/10/explainer-war-crime-191021062757444.html> on 27/08/2020.
- Šimić, Goran, Kazić, Ena. "Legal challenges in regulation of minimum age of criminal responsibility with special emphasis on Bosnia and Herzegovina", *Epiphany*, Vol. 10., 1/2017;

- Tomić, Zvonimir (2008) *Krivičnopravo I (Criminal Law I)*. Sarajevo: University of Sarajevo;
- Tripković, M. And Plesničar, M. M. (2018) "Women, crime rates and punishment: a global view". In: M M. Plesnicar, A. Šelih, K. Filipčič (eds.). *Ženske in kriminaliteta: značilnosti ženske kriminalitete in družbeno odzivanje nanjo*, (Razprave, 36). Ljubljana: Slovenian Academy of Science, Institute of Criminology Ljubljana, p. 9-23.
- Trisko Darden, Jessica, Alexis Leanna Henshaw, and Ora Szekely. (2019). *Insurgent Women: Female Combatants in Civil Wars*. Washington, DC: Georgetown University Press.
- The International Committee of the Red Cross (2007). *Women in war: a particularly vulnerable group?* Retrieved from <https://www.icrc.org/en/doc/resources/documents/feature/2007/women-vulnerability-010307.htm> on 27/08/2020.
- UpCounsel, LLC. (2020). *Can a Corporation Be Charged with a Crime?* Retrieved from <https://www.upcounsel.com/can-a-corporation-be-charged-with-a-crime> on 05/09/2020.
- Uomini Counselling for Male Victims of Domestic Abuse, (2018). *Female Perpetrators Service*. Retrieved from <https://uomini.co.uk/female-perpetrators> on 04/09/2020.
- Viljoen, S. (2020). *Crime: Perpetrator, co-principals, accomplices, beneficiaries*. Retrieved from <https://regsdienste.solidariteit.co.za/en/crime-perpetrator-coprincipals-accomplices-beneficiaries/> on 04/09/2020.
- "Prica-o-zenana-iza-resetaka-marina-je-u-zatvoru-zbog-ratnog-zlocina-a-almira-zbog-krade-i-pokusaja-ubistva", retrieved from <https://www.oslobodjenje.ba/vijesti/crna-hronika/video-prica-ozenana-iza-resetaka-marina-je-u-zatvoru-zbog-ratnog-zlocina-a-almira-zbog-krade-i-pokusaja-ubistva-416208> on 12/09/2020;
- <https://www.wisegEEK.com/what-is-a-perpetrator.htm> on 04/09/2020;
- <https://www.historyextra.com/period/victorian/the-born-criminal-lombroso-and-the-origins-of-modern-criminology/> on 12/09/2020;
- <http://www.un.org/icty> on 01.09.2020;
- "History Queen Zenobia Defied Rome", retrieved from <https://www.nationalgeographic.com/history/magazine/2017/11-12/history-queen-zenobia-defied-rome/>
- "Fu Hao", retrieved from

<https://www.encyclopedia.com/women/encyclopedias-almanacs-transcripts-and-maps/fu-hao-fl-1040-bce> on 11.06.2020.

“Artemisia I”, retrieved from

<https://www.britannica.com/biography/Artemisia-I>, on 16.06.2020.

“Cynane”, retrieved from <https://www.ancient.eu/Cynane> on 16.06.2020.

<https://www.historyhit.com/10-great-female-warriors-of-the-ancient-world/>

“Trieu Thrinh the Vietnamese Joan of Arc”, retrieved from

<https://amazingwomeninhistory.com/trieu-thi-trinh-the-vietnamese-joan-of-arc/>, on 16.06.2020.

*Criminal Justice Illuminated*; retrieved from <http://criminology.jbpub.com/>, on 16.06.2020.

Verdict in case Plavšić IT-00-39 & 40/1;

Verdict in case Bašić S1 1 K 018557 17 Kri;

Verdict in case Handanović S1 1 K 009162 12 Kro,

Verdict in case Kamerić S1 1 K 010132 15 Krž;

Verdict in case Terzić S1 1 K 005665 11 KrI;

Verdict in case Grubišić Fejzić (Zelenika et al.) S1 1 K 009124 12 Kri;

Verdict in case Veseli (Halilović et al.) S1 1 K 020147 17 KrI.