

**European Court of Human Rights  
Council of Europe  
Strasbourg, France**

**Application under Art. 34 of the European Convention on Human Rights and Rules  
45 and 47 of the Rules of the Court**

**European Court of Human Rights reference: 13624/03 KOKY and Others v.  
Slovakia**

**I. THE PARTIES**

**A. The applicants**

Family name: Koky  
First name: Jan  
Gender: male  
Nationality: Slovak  
Occupation: unemployed  
Date of Birth: 22 July 1959  
Permanent address: Ganovce 67, Slovakia

Family name: Kocko  
First name: Martin  
Gender: male  
Nationality: Slovak  
Occupation: unemployed  
Date of Birth: 27 August 1985  
Permanent address: Ganovce 30, Slovakia

Family name: Kokyova  
First name: Zanita  
Gender: female  
Nationality: Slovak  
Occupation: unemployed  
Date of Birth: 12 June 1984  
Permanent address: Ganovce 67, Slovakia

Family name: Balaz  
First name: Milan  
Gender: male  
Nationality: Slovak  
Occupation: unemployed  
Date of Birth: 20 October 1978  
Permanent address: Ganovce 13, Slovakia

Family name: Koky  
First name: Rastislav  
Gender: male  
Nationality: Slovak  
Occupation: unemployed  
Date of Birth: 26 March 1982  
Permanent address: Ganovce 67, Slovakia

Family name: Kokyova  
First name: Renata  
Gender: female  
Nationality: Slovak  
Occupation: unemployed  
Date of Birth: 26 July 1978  
Permanent address: Ganovce 67, Slovakia

Family name: Kokyova  
First name: Ruzena  
Gender: female  
Nationality: Slovak  
Occupation: unemployed  
Date of Birth: 13 December 1959  
Permanent address: Ganovce 67, Slovakia

Family name: Conkova  
First name: Renata  
Gender: female  
Nationality: Slovak  
Occupation: unemployed  
Date of Birth: 12 February 1975  
Permanent address: Ganovce 61, Slovakia

Family name: Lackova  
First name: Justina  
Gender: female  
Nationality: Slovak  
Occupation: unemployed  
Date of Birth: 15 April 1968  
Permanent address: Ganovce 69, Slovakia

Family name: Koky  
First name: Jan  
Gender: male  
Nationality: Slovak  
Occupation: unemployed  
Date of Birth: 31 July 1976

Permanent address: Letna ul.30, Poprad, Slovakia

Appointed representatives of the applicant:

Gloria Jean Garland

Legal Director

European Roma Rights Center (ERRC), 1386 Budapest 62, P.O.Box 906/93, Hungary.

Telephone: 0036 1 413 22 00 Fax: 0036 1 413 2201

Dr Columbus Igboanusi

Director

The League of Human Rights Advocates, Zabatova 2, P.O.Box 64, 81 000 Bratislava, Slovakia

Telephone and fax: 00 421 2 52494720

## **B. The High Contracting Party**

Slovakia

## **II. STATEMENT OF THE FACTS**

II.1. All of the applicants are Slovak citizens of Romani ethnic origin who were subjected to a violent racially motivated attack perpetrated by non-State actors (most likely skinheads), in which they suffered serious injuries and damage to their property. Following the incident the Slovak authorities failed to carry out an effective investigation or provide an effective remedy for the violations.

II.2. On 28 February 2002 at about 19.00 an argument arose when Irena Suchanovska, the (non-Romani) owner of the bar "Pegas" in the village of Ganovce-Filice refused to serve an alcoholic drink to Martin Koky. During the dispute, Mrs Suchanovska telephoned her son, Peter Suchanovsky, who is believed to be a member of an extremist "skinhead" group in the nearby city of Poprad. At about 22.00 on the same day, a group of approximately 30 young men armed with baseball bats and iron bars surrounded the Roma settlement where the applicants live. They shouted threatening racist chants, for example "Roma come out, we will kill you all today", and started to break the windows and doors of some houses in the settlement. They then entered some of the homes and started to physically attack the inhabitants and damage their buildings and possessions. One Romani man managed to telephone the Police, while hiding under a bed. The attackers found out that the Police had been called and left the settlement, continuing to physically attack any Roma that they came across.

II.3. The Police arrived at the scene of the incident at about 23.00, approximately one hour after the incident. They conducted a preliminary interview with some of the victims of the attack.

II.4. During the incident, two of the applicants suffered serious physical injuries, as a result of which Rastislav Koky had to spend two weeks in hospital for multiple head injuries, and Martin Kocko had to spend one month in hospital for serious injuries to his arms. Damage to the applicants' property and possessions was estimated by the District Police Investigator to amount to at least SKK 13,000.

II.5. On 1 March 2002, the District Police Investigator in Poprad initiated a criminal investigation<sup>1</sup> into the offence of violating the privacy of a home<sup>2</sup>, causing intentional damage to private property<sup>3</sup> and causing intentional bodily harm<sup>4</sup>. In a further resolution of the District Police Investigator<sup>5</sup> on 13 March 2002, the charge of committing the criminal offence of violence against a group of inhabitants<sup>6</sup> was added. The resolution also re-qualified two of the original charges. On 10 April 2002 during a line-up and by photographs, Martin Kocko, Rastislav Koky, Jan Koky and Zaneta Kokyova all identified perpetrators that took part in the attack. The Police investigating the incident conducted interviews with all of the applicants during March 2002. However they only interviewed three of the suspected perpetrators (from the 30 involved in the incident) on 5 and 14 March and never re-interviewed them after completing all of the witness interviews<sup>7</sup>.

II.6. On 26 April 2002 the District Police Investigator suspended the criminal investigation into the attack<sup>8</sup> on the alleged grounds that the investigator was unsuccessful in establishing the facts of the case. On 3 May 2002 Jan Koky and Rastislav Koky filed a complaint<sup>9</sup> against the suspension of the investigation. In a resolution of 22 May 2002, the District Prosecutor in Poprad determined<sup>10</sup> that "the victims are not entitled to file a complaint against the resolution on suspending a criminal prosecution" as "the resolution is not a decision on the claims of the victims arising out of the acts committed by the perpetrators of the crimes". Nevertheless, the District Prosecutor said in her letter of 22 May 2002 that she had found the decision to suspend the investigation to be illegal<sup>11</sup>, and that she had asked, on 3 May 2002, for the investigation to be reopened<sup>12</sup>. The investigation was again suspended on 26 June 2002<sup>13</sup> on the alleged grounds that the Investigator was again unsuccessful in establishing the facts of the case. The Legal Adviser for the applicants again appealed against this

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<sup>1</sup> Resolution of the District Prosecutors Office number CVS:OUV-146/10-PP-2002, Exhibit 1

<sup>2</sup> Slovak criminal code article 238

<sup>3</sup> Slovak criminal code article 257

<sup>4</sup> Slovak criminal code article 221

<sup>5</sup> resolution CVS:OUV-146/10-PP-2002, Exhibit 2

<sup>6</sup> Slovak criminal code art 196

<sup>7</sup> See Exhibit 15

<sup>8</sup> resolution CVS:OUV-146/10-PP-2002, Exhibit 3

<sup>9</sup> letter, Exhibit 4

<sup>10</sup> resolution 2 Pv 217/02-49, Exhibit 5

<sup>11</sup> letter, Exhibit 6

<sup>12</sup> resolution CVS:OUV-146/10-PP-2002, Exhibit 7

<sup>13</sup> resolution OUV-146/10-PP-2002

decision on 3 July 2002 to the District Police Investigator<sup>14</sup> and on 11 July 2002 to the Slovak Prosecutor General<sup>15</sup>. On 17 July 2002 the District Prosecutor<sup>16</sup> again rejected the appeal, once again on the grounds that the Slovak Code of Criminal Procedure does not include provisions which allow a victim to appeal against a decision to suspend a criminal investigation, when the resolution to suspend the investigation does not make a decision on the claims of the victims<sup>17</sup>. The Prosecutor General did not reply.

II.7. The Police Investigators did not conduct any interviews with applicants, witnesses or suspects, during the time the case was re-opened (3 May – 26 June 2002)<sup>18</sup>.

II.8. On 20 September 2002, a petition was submitted to the Slovak Constitutional Court that the Slovak authorities had not thoroughly and effectively investigated the crime, had failed to take account of the fact that the crime was racially motivated, and had failed to provide any domestic remedy and redress for the violations at issue. On 23 October 2002 the Slovak Constitutional Court, in a closed session, rejected the claims<sup>19</sup> on the grounds that the victims could have filed a request with the District Prosecutor to re-open the criminal investigation (which, of course, they had already tried). The Constitutional Court inexplicably and incorrectly claimed that the victims had not used this remedy. As the facts of this case show, the victims had asked the Slovak Prosecutor on 3 May 2002 and on 11 July 2002 to re-open the investigation and were advised that they had no standing to make such a request under Slovak law. The resolution of the Constitutional Court does not provide for any appeal against the decision.

### **III. STATEMENT OF ALLEGED VIOLATIONS OF THE CONVENTION AND PROTOCOLS AND OF RELEVANT ARGUMENTS**

III.1. In the attack on the Roma settlement and the subsequent investigation, there have been violations of a number of rights guaranteed by the European Convention for the Protection of Human Rights and Fundamental Freedoms, in particular, of Article 3, Article 8 and Article 1 of the First Protocol, Article 13 taken in conjunction with Articles 3 and 8, and Article 14 read in conjunction with Articles 3, 8 and 13.

III.2. The applicants respectfully submit that the allegations of violations of the Convention should be considered against the backdrop of systemic discrimination and racist attacks to which the Roma in Slovakia are subjected, and the repeated failure of State authorities to investigate and prosecute such crimes. The applicants therefore submit at Exhibit 12 a non-comprehensive survey of similar recent events and observations by international monitoring organisations. In summary, these organisations

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<sup>14</sup> letter, Exhibit 8

<sup>15</sup> letter, Exhibit 9

<sup>16</sup> resolution 2 P v 217/02-67, Exhibit 10

<sup>17</sup> Slovak Code of Criminal Procedure, Article 43

<sup>18</sup> See Exhibit 15

<sup>19</sup> Constitutional Court decision III.US 151/02-19, Exhibit 11

all found that the authorities in Slovakia often failed to carry out prompt, impartial and thorough investigations and effective prosecutions into racially motivated attacks against Roma.

### **Violations of Article 3**

III.3. The applicants raise two independent complaints under Article 3:

- a) the applicants were subjected to violence and a fear of death that caused physical and mental suffering amounting to torture, inhuman and degrading treatment,
- b) the Slovak authorities have failed to carry out a prompt, impartial and effective official investigation capable of leading to the identification and punishment of the perpetrators of the crime, despite the identification of perpetrators in a line-up, photograph identification, and witness statements. Only three of the suspected perpetrators were interviewed by the Police, and then only at the beginning of the investigation. The Police did not interview any witnesses or suspects while the case was re-opened<sup>20</sup>. As the reports of monitoring organisations show<sup>21</sup>, a failure by the Slovak authorities to investigate attacks on Roma by non-State actors would appear to be a common violation.

III.4. In support of their claims the applicants rely on the relevant European Court of Human Rights jurisprudence.

#### Complaint (a) under Article 3: torture, inhuman and degrading treatment

III.5. The applicants allege that they were physically beaten with baseball bats and iron bars that caused serious injuries, and that they were subjected to mental suffering during this racially motivated attack as the perpetrators issued death threats. Under European Court jurisprudence this amounts to torture, inhuman and degrading treatment.

III.6. The Strasbourg Court has made clear that Article 3 prohibits the infliction, not only of physical injury, but also of mental suffering. In the case of *Ireland v. the United Kingdom*<sup>22</sup>, the European Court of Human Rights defined the terms used in Article 3 as follows:

Torture: “deliberate inhuman treatment causing very serious and cruel suffering”.

Inhuman treatment: “the infliction of intense physical and mental suffering”.

Degrading treatment: “ill-treatment designed to arouse in victims feelings of fear, anguish and inferiority capable of humiliating and debasing them and possibly breaking their physical or moral resistance”.

III.7. In the *Greek case* the European Commission explained: “The notion of inhuman treatment covers at least such treatment as deliberately causes severe suffering, mental or physical, which in the particular situation, is unjustifiable. . . . Treatment or punishment of an individual may be said to be degrading if it grossly humiliates him before others or

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<sup>20</sup> See Exhibit 15.

<sup>21</sup> See Exhibit 12.

<sup>22</sup> *Ireland v. United Kingdom*, A-25 (1978).

drives him to act against his will or conscience.”<sup>23</sup> In that case, the Commission found that Article 3 covered “the infliction of mental suffering by creating a state of anguish and stress by means other than bodily assault.”<sup>24</sup>

III.8. In evaluating the applicants’ claims the Court should take into account their Roma ethnicity, a discrete and historically disadvantaged minority group, which renders them particularly vulnerable to degrading treatment. The European Court of Human Rights has made it clear that in evaluating claims of violation of Article 3, it will take into account a range of factors that bear on the vulnerability of the victims. Thus in its judgement in *Ireland v. United Kingdom*, the Court held:

“... ill treatment must attain a minimum level of severity if it is to fall within the scope of Article 3. The assessment of this minimum is in the nature of things, relative; it depends on all the circumstances of the case, such as the duration of the treatment, its physical or mental effects and in some cases, the sex, age, and state of health of the victim, etc.”<sup>25</sup>

The rationale for taking account of the victim’s sex, age and state of health in assessing whether Article 3 has been violated is clear: the level of ill-treatment required to be “degrading” depends, in part, on the vulnerability of the victim to physical or emotional suffering. The same reasoning can be applied to a minority group, which has been subjected to discrimination and prejudice which renders a victim more vulnerable to ill-treatment, as in this application, and where the Slovak authorities have consistently failed to address systemic violence and discrimination against Roma<sup>26</sup>.

III.9. In its admissibility decision in the case of *Arthur Hilton v. United Kingdom*<sup>27</sup>, where the applicant, a black inmate, complained of various forms of ill-treatment, the Commission found that “the author’s allegations of assault, abuse, harassment, victimisation, racial discrimination and the like raise an issue under Article 3 of the Convention.”<sup>28</sup>

All else being equal, a given level of physical abuse is thus more likely to constitute “degrading or inhuman treatment or punishment” when motivated by racial circumstances, than when racial considerations are absent.

#### Complaint (b) under Article 3: failure to carry out an effective investigation

III.10. The Slovak authorities failed to carry out an effective investigation into the complaints by the applicants, an arguable claim that they had been subjected to torture, inhuman and degrading treatment. Despite witness statements (29 were taken in March 2002) and the identification of perpetrators in a line-up and by photographs, the authorities allege that they were “unsuccessful in establishing the facts of the case”.

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<sup>23</sup> Report of 5 November 1969, Yearbook XII; The Greek case (1969), p186

<sup>24</sup> Ibid., p461

<sup>25</sup> Judgement of 18 January 1978, 2 EHRR 25, para. 162

<sup>26</sup> See Exhibit 12

<sup>27</sup> *Arthur Hilton v. United Kingdom*, Application No. 5613/72, Decision of 5 March 1976.

<sup>28</sup> Ibid. p.187

However only three of the suspects (from 30 involved in the incident) were interviewed, and then only at the beginning of the investigation. None were interviewed after the line-up, nor were any interviews or statements taken from suspects or witnesses while the case was re-opened between 3 May and 26 June 2002<sup>29</sup>. Thus, the Slovak State is in breach of Article 3 for not carrying out an effective investigation that might have led to the identification and prosecution of the perpetrators of the crime.

III.11. In the Judgment of *Assenov and Others v. Bulgaria*, the European Court stated that "... where an individual raises an arguable claim that he has been seriously ill-treated ... unlawfully and in breach of Article 3, that provision, read in conjunction with the State's general duty under Article 1 of the Convention to 'secure to everyone within their jurisdiction the rights and freedoms in the Convention', requires by implication that there should be an effective official investigation. This obligation ... should be capable of leading to the identification and punishment of those responsible.... If this were not the case, the general legal prohibition of torture and inhuman and degrading treatment and punishment, despite its fundamental importance, would be ineffective in practice and it would be possible in some cases for agents of the State to abuse the rights of those within their control with virtual impunity."<sup>30</sup>

### **Violations of Article 8 and Article 1 of the First Protocol**

III.12. The applicants allege that the perpetrators' unsolicited intrusion into the applicants' homes, in which the perpetrators indiscriminately and violently attacked men, women and children, and destroyed property and possessions in the houses, constitutes a violation of Article 8 and Article 1 of the First Protocol.

III.13. European Court jurisprudence shows that Article 8 involves positive obligations on the State to protect individuals from interference in their private and family life, home and correspondence. In *X and Y v. Netherlands* the Court stated that "these obligations may involve the adoption of measures designed to secure respect for private life even in the sphere of the relations between individuals themselves."<sup>31</sup>

III.14. The applicants complain that the failure by the Slovak authorities to prevent and suppress acts of racist violence, failure to carry out an effective investigation into the incident and failure to provide a remedy for the violations, constitutes a breach of the Slovak Government's positive obligations under Article 8.

### **Violations of Article 13 in conjunction with Articles 3 and 8**

III.15. The applicants complain that the Slovak authorities' failure to effectively

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<sup>29</sup> See Exhibit 15.

<sup>30</sup> *Assenov and Others v. Bulgaria*, (90/1997/874/1086), Judgment of 28 October 1998, para. 102.

<sup>31</sup> (1985) 8 EHRR 235, para. 23



investigate and prosecute the perpetrators of the crimes committed against the applicants, despite witness statements and the identification of suspected perpetrators, in itself constitutes a separate and independent violation of the applicants' right to an "effective remedy before a national authority" under Article 13. Under the Slovak legal system, only Public Prosecutors may bring criminal cases to court. In this case, only 3 suspected perpetrators were interviewed, once each, at the beginning of the investigation. No suspects were interviewed after all of the witness statements had been taken. No one was interviewed after the line-up and photo identification. No one was interviewed while the case was re-opened (3 May – 26 June 2002)<sup>32</sup>. The applicants tried twice with the District Prosecutor and once with the Slovak Prosecutor General to have the investigation re-opened. They were unsuccessful as they had no legal standing under Slovak law to ask for a criminal investigation to be re-opened, when the decision to suspend the investigation had not made any decision or bearing on the victims' claims. The applicants submit that the Slovak authorities have therefore denied them an effective remedy at a national level.

III.16. The European Court has repeatedly held that Article 13 "guarantees the availability at the national level of a remedy to enforce the substance of the Convention rights and freedoms in whatever form they might happen to be secured in the domestic legal order. The effect of this article is thus to require the provisions of a domestic remedy to allow the competent national authorities both to deal with the substance of the relevant complaint and to grant appropriate relief."<sup>33</sup>

III.17. *Aydin*, 25 September 1997, Reports 1997 – VI:

"The nature of the right safeguarded under Article 3 of the Convention has implications for Article 13. Given the fundamental importance of the prohibition of torture and the especially vulnerable position of torture victims ... Article 13 imposes, without prejudice to any other remedy available under the domestic system, an obligation on States to carry out a thorough and effective investigation of incidents of torture. Accordingly, where an individual has an arguable claim that he or she has been tortured ... the notion of an "effective remedy" entails, in addition to the payment of compensation where appropriate, a thorough and effective investigation capable of leading to the identification and punishment of those responsible including effective access for the complainant to the investigatory procedure."<sup>34</sup>

"Having regard to these principles, the Court notes that the applicant was entirely reliant on the public prosecutor and the police acting on his instructions to assemble the evidence necessary for corroborating her complaint. His role was critical not only to the pursuit of criminal proceedings against the perpetrators of the offences but also to the pursuit by the applicant of other remedies to redress the harm she suffered. The ultimate effectiveness of those remedies depended on the proper discharge by the public prosecutor

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<sup>32</sup> See Exhibit 15.

<sup>33</sup> *Aksoy v. Turkey*, judgment of 18 December 1996, para. 95.

<sup>34</sup> Para 113 and see the *Aksoy* judgment cited above, p. 2287, para. 98.

of his functions.”<sup>35</sup>

“In the light of the above considerations, it must be concluded that no thorough and effective investigation was conducted into the applicant’s allegations and that this failure undermined the effectiveness of any other remedies which may have existed given the centrality of the public prosecutor’s role to the system of remedies as a whole, including the pursuit of compensation. In conclusion, there has been a violation of Article 13 of the Convention.”<sup>36</sup>

### **Violations of Article 14 in conjunction with Articles 3, 8 and 13**

III.18. The applicants allege that the ill-treatment they suffered, along with the subsequent lack of an effective investigation leading to a prosecution of the perpetrators of the crime, and the absence of a remedy, were due to their Roma ethnicity and therefore in violation of Article 14 in conjunction with Articles 3, 8 and 13.

III.19. The applicants respectfully submit that the discriminatory motive in this case is clear:

- i) the incident took place in a Roma settlement, in which only Roma were beaten and had their property damaged,
- ii) the attackers shouted threatening racist chants,
- iii) the Slovak authorities often fail to effectively investigate and prosecute instances of anti-Roma violence, as documented by numerous international and national monitoring organisations<sup>37</sup>. The police investigating the instant case excluded the possibility that the incident could have been racially motivated before interviewing the witnesses to the attack. Frantisek Schwarz, Director of the District Police Investigator, made statements after the incident to the Slovak media that the crime was not racially motivated<sup>38</sup>. He repeated this view in a letter to the applicants’ legal representative<sup>39</sup>.

### **IV. STATEMENT RELATIVE TO ARTICLE 35 (1) OF THE CONVENTION**

IV.1. As to the admissibility of this complaint, the applicants respectfully submit that all domestic remedies in the case have been exhausted and that a pre-application letter was sent to the Registrar of the European Court of Human Rights on 17 April 2003 (within six months after exhaustion of all domestic remedies, for the purposes of Article 35(1) of the Convention). This letter was acknowledged by Mr Blasko, Legal Secretary at the European Court, on 29 April 2003.

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<sup>35</sup> Para 104.

<sup>36</sup> Para 109.

<sup>37</sup> See Exhibit 12.

<sup>38</sup> Press article from SME national newspaper, Exhibit 13

<sup>39</sup> Letter, Exhibit 14

IV.2. The resolution of the Slovak Constitutional Court on 23 October 2002 represents the last domestic decision.

IV.3. Other decisions:

1 March 2002	Resolution of the District Police Investigator to open an investigation
13 March 2002	Resolution of the District Police Investigator with a further charge and re-qualification of two original charges
26 April 2002	Resolution of the District Police Investigator to suspend the investigation
3 May 2002	Resolution of the District Police Investigator to reopen the investigation
22 May 2002	Resolution of the District Prosecutor to reject the appeal against the first suspension the investigation
26 June 2002	Resolution of the District Police Investigator to suspend the investigation for the second time
17 July 2002	Resolution of the District Prosecutor to reject the appeal to re-open the investigation

IV.4. The District Prosecutor's Office refused to entertain the applicants' request to re-open the investigation, and the Constitutional Court only sent them back to repeat the same unsuccessful procedure they had already tried. Thus, having exhausted domestic remedies, the applicants have no alternative but to turn to the European Court of Human Rights.

## **V. STATEMENT OF THE OBJECT OF THE APPLICATION**

The objective of the application is to find the Slovak Government in breach of Article 3, Article 8 and Article 1 of the First Protocol, Article 13 taken in conjunction with Articles 3 and 8, and Article 14 read in conjunction with Articles 3, 8 and 13 of the European Convention on Human Rights, and for the applicants to obtain just compensation.

## **VI. STATEMENT CONCERNING OTHER INTERNATIONAL PROCEEDINGS**

No complaint has been submitted to any other international procedure of investigation or settlement.

## **VII. LIST OF DOCUMENTS**

- Exhibit 1 – Resolution of the District Police Investigator, 1 March 2003
- Exhibit 2 – Resolution of the District Police Investigator, 13 March 2003
- Exhibit 3 - Resolution of the District Police Investigator, 26 April 2002
- Exhibit 4 – Letter from the League of Human Rights Advocates to the District Police Investigator, 3 May 2002
- Exhibit 5 – Letter from the District Prosecutor to the League of Human Rights Advocates, 22 May 2002
- Exhibit 6 – Resolution of the District Prosecutor, 22 May 2002
- Exhibit 7 – Resolution of the District Police Investigator, 3 May 2002
- Exhibit 8 – Letter from the League of Human Rights Advocates to the District Police Investigator, 3 July 2002
- Exhibit 9 – Letter from the League of Human Rights Advocates to the Prosecutor General, 11 July 2002
- Exhibit 10 – Letter from the District Prosecutor to the League of Human Rights Advocates, 17 July 2002
- Exhibit 11 – Resolution of the Slovak Constitutional Court, 23 October 2002
- Exhibit 12 – Observations by International Organisations on recent cases of racist attacks against Roma in Slovakia
- Exhibit 13 – Press article from SME Slovak daily newspaper, 5 March 2002
- Exhibit 14 – Letter from the District Police Investigator, 11 March 2002
- Exhibit 15 – List of witnesses and suspects, and dates when interviewed by the police

## **VIII. DECLARATION AND SIGNATURE**

I hereby declare that, to the best of my knowledge and belief, the information I have given in the present application form is correct.

Place:

Date:

Signature of the applicants' representative:

Gloria Jean Garland  
Legal Director  
European Roma Rights Center