

Subject matter of the application

All the information concerning the facts, complaints and compliance with the requirements of exhaustion of domestic remedies and the six-month time-limit laid down in Article 35 § 1 of the Convention must be set out in this part of the application form (sections E, F and G). It is not acceptable to leave these sections blank or simply to refer to attached sheets. See Rule 47 § 2 and the Practice Direction on the Institution of proceedings as well as the "Notes for filling in the application form".

E. Statement of the facts

- 56.
1. The applicant is a Macedonian national of Roma ethnic origin who is currently staying in Trier, Germany. The applicant has given his registered address in Macedonia on page 1 of this form. At the time of the incident described below the applicant was living in Topaana, a well-known Roma-majority neighbourhood in the Chair Municipality in Skopje, Macedonia. The applicant submits that it is a well-known fact that Topaana is a Romani neighbourhood and that anyone living there, or even present there, would likely be presumed to be Romani. The applicant was working in the Ministry of Defence with a rank of "staff sergeant" in the Artillery Battalion within the 1st Mechanised Infantry Brigade – Joint Operational Command of the Army of the Republic of Macedonia.
 - A. The events of 5-6 May 2013
 2. On 5 May 2013, at around 21.30 hours, on the eve of the Romani holiday of Hederlezi, police raided the Topaana neighbourhood, ostensibly to locate an escaped convict. About 50 police officers participated, including ordinary units and the special "Alfa" urban street crime unit. On the "Alfa" unit, see *Kitanovski v Macedonia* (2015); see also application no.173/17 (X & Y v Macedonia). The police clashed with local residents; Interior Ministry officials and Topaana residents give different accounts of the events. The applicant does not know the alleged fugitive.
 3. During the raid, the applicant was making purchases in a local shop ("Medzik"), next to his home. While he was inside, several police officers entered the shop and started to insult and physically attack the applicant and others present, hitting them on their heads and bodies with brass knuckles and batons. One of the police officers said to the applicant "shut up, you Gypsy motherfucker" (ќути пичка ти матер циганска). The applicant repeatedly protested while trying to explain that he belonged to the military; he did not physically resist or verbally or physically attack the police officers. The applicant suffered bodily injuries.
 4. Together with four other men (one other Romani man, one Albanian, one Bosniak, and one Turk, as later recorded by the domestic courts), the applicant was taken into custody at the Kisela Voda police station. The applicant sat handcuffed for two hours because the police officers who were present claimed they did not have a key for the handcuffs. On 6 May, at 19.45 hours, the applicant was brought before the investigative judge at Basic Court Skopje 1, where he denied committing any criminal offence and insisted that he was the victim of police brutality. On the same day, the Basic Public Prosecutor's Office Skopje (hereinafter "the BPPO") filed a request with the investigative judge of Basic Court Skopje 1 to launch an investigation into the conduct of the applicant and the other suspects and to issue a detention order. See Annex 4.
 5. On 6 May, major media in Macedonia reported on the police action in Topaana (Annex 1), including reporting on allegations of excessive and disproportionate use of force; some of the media featured interviews with local residents and video footage of the police action. On the same day, the Interior Ministry released information in their daily bulletin stating that during the police action in Topaana, a group of citizens resisted arrest and threw stones at the police, causing damage to one vehicle and injuries to two members of the Alfa unit. The bulletin is no longer available online, but the Government should be able to produce a copy of it.
 6. The applicant was released from detention on 7 May 2013 at around 03.30 hours (i.e. after approximately 30 hours in detention). Upon release, the applicant photographed his injuries (Annex 2) and visited a doctor who observed contusions, one stretching from the right side of the collar bone, 11-12 cm long, and other on the left shoulder, 22-23cm long (Annex 3). The diagnosis stated "contusio corporis"; the diagnosis also noted that touching the applicant's head caused him pain.
 7. On the same day, the investigative judge of Basic Court Skopje 1 opened an investigation against the applicant and four other men for the criminal offence of "attack upon an official person when performing official duties" (Article 383 § 2 of the Criminal Code). As a preventive measure to secure the suspects' availability for the investigation, the judge ordered the applicant (and three other men) to report to court every Monday at 09.00 hours (Annex 4).
 8. Within the legally prescribed 48 hours, the applicant appealed the decision, arguing that the judge had failed to provide any reason that would justify the accusations against him (Annex 5). He argued that there was no evidence showing a crime had been committed and claimed that he had been a victim of police brutality. The applicant also argued that he and three other suspects against whom the preventive measure was issued were treated as one party; the authorities should have individualised the accusations against them.
 9. Due to head pain and pain throughout his body, as well as dizziness and fainting, on 9 May 2013 the applicant sought urgent medical treatment at the Orthopaedic Clinic at "8 September" City General Hospital. The applicant was admitted as a matter of urgency and a specialist concluded that he had suffered injuries in the form of contusions on his head, neck,

Statement of the facts (continued)

57. and chest. The applicant was released from hospital and in the following days he returned several times, as agreed, to be examined by a doctor. The applicant also sought treatment from a psychiatrist during this period. The psychiatrist, who saw the applicant three times, diagnosed him with the post-traumatic stress disorder (Annex 6).

10. On 13 May 2013, the European Roma Rights Centre (hereinafter "the ERRC", the applicant's representative) sent a letter (Annex 7) to the Interior Ministry expressing concern over reports of excessive and arbitrary police force that was used during the incident. Roma from Topaana had told the ERRC that police officers had forcibly entered several houses and local shops without providing any explanation; that the officers had harassed and pushed people, often in the presence of children; that they had kicked and punched people with their fists and batons; and that around ten individuals (seven men and three women) had been assaulted. The ERRC called on the authorities to conduct an independent, thorough, and effective investigation and make the findings of the investigation public.

11. On 16 May 2013 the Criminal Council of the Basic Court Skopje 1 rejected the applicant's appeal against the decision to launch an investigation and issue a preventive measure (Annex 8).

12. On 10 June 2013 the Investigative Judge of the Basic Court Skopje 1 issued a decision (Annex 9) ending the criminal investigation against the applicant due to a lack of evidence that any criminal offence had been committed.

13. On 20 June 2013 the Helsinki Committee for Human Rights in Macedonia ("the HCHRM") filed a complaint with the Interior Ministry – Department for Internal Control ("the DIC") against members of the Unit for the Fight Against Crime – Sector Skopje for overstepping their authority during the police raid (Annex 10).

14. On 5 July 2013 the DIC dismissed the HCHRM's complaint as unfounded (Annex 11). The DIC acknowledged that force had been used during the action, and in particular specified that in the local shop one police officer hit someone twice on the head with his open hand and that another police officer used physical force against a second individual because that individual said "you cannot behave like this just because you are the police". However, the DIC concluded that the police acted in accordance with the law and the use of force was justifiable and proportionate. In addition, the DIC indicated that emergency medical attention was provided to those who were detained, although the applicant denies receiving any medical treatment during his detention. An identical response was sent to the ERRC on 15 July 2013 (Annex 12).

B. The applicant's attempts to seek justice

15. On 10 September 2013, the applicant, supported by the ERRC, filed a separate complaint through his lawyer to the DIC, enclosing his medical documentation (Annex 13). On 13 September 2013, the DIC responded (Annex 14) that the investigation into the incident on 5 May 2013 in Topaana had already been concluded and that no new inquiries would be made. In addition, the DIC prepared a Special Report (no. 13.4 – 87315) dated 12 September 2013 for the BPPO. A copy of this report has never been made available to the applicant.

16. On 28 March 2014 the applicant's lawyer filed a criminal complaint (Annex 15) with the BPPO against four identified and other unidentified police officers for the criminal offences of unlawful deprivation of liberty (Article 140 § 4 of the Criminal Code), torture and other cruel, inhuman, or humiliating activities and punishments (Article 142 § 1), harassment while performing a public duty (Article 143 § 1), acts of violence (Article 386 §§ 1 and 2), and racial or other discrimination (Article 417 § 1). The complaint named several eyewitnesses who were in the shop with the applicant during the assault.

17. After five months of inactivity, on 1 September 2014 the applicant's lawyer asked the BPPO to notify her what actions the BPPO had taken and when the applicant would be summoned to give testimony (Annex 16).

18. Due to constant police harassment following his complaint, including police presence around his house and frequent, threatening phone calls, the applicant and his family fled Macedonia on 1 November 2014 to seek asylum in Germany.

19. On 29 November 2014 the BPPO rejected the criminal complaint because the offences complained of were not "subject to ex officio prosecution" (бидејќи пријавеното дело не е кривично дело за кое се гони по службена должност) (Annex 17). The applicant appealed to the Higher Public Prosecutor's Office ("the HPPO") on 22 December 2014 (Annex 18). On 18 February 2015 the HPPO upheld the appeal, ordering the BPPO to investigate further (Annex 19).

20. On 25 March 2016 the applicant's lawyer sent a request to the HPPO requesting them to take over the prosecution from the BPPO (Annex 21).

21. On 21 October 2016, the applicant's lawyer sent an urgent request (Annex 23) to the HPPO to act upon the criminal complaint filed by the applicant and take over the prosecution from the BPPO, given that two years and seven months had passed since the criminal complaint had been filed and eight months since their decision (see above, § 19 in fine).

22. On 17 March 2017 the BPPO rejected the applicant's criminal complaint (Annex 26) because the evidence available did not raise a sufficient suspicion of criminal activity to justify launching an investigation. The BPPO noted that the applicant had visible injuries at the moment when he was brought to the Kisela Voda police station. The BPPO had heard evidence from some of the police officers involved and looked at police records before reaching their conclusion. The BPPO did not interview any of the eye witnesses present in the shop with the applicant, whose names were mentioned in the criminal complaint. The BPPO's reasoning seems to be that it could not determine which of the police officers in the shop assaulted the applicant. It appears from the document number that the case never moved past the pre-criminal stage; if it had,

Statement of the facts (continued)

58. it would have had a number starting with the letters Ki (Ки). The BPPO reasoned that they needed the applicant's testimony but he had left the country; there is no indication of any steps made to contact the applicant in the seven months between his complaint and his departure, nor of any use the authorities made of the 2010 Law on International Cooperation on Criminal Matters to secure assistance from the German authorities to secure evidence from the applicant. On 12 April 2017, the applicant lodged an appeal with the HPPO against the decision of the BPPO (Annex 27).

C. Other proceedings initiated by the applicant

23. On 15 April 2016 the applicant filed a discrimination claim with the civil Basic Court Skopje 2 against the Interior Ministry (Annex 22) arising out of the events described above. A hearing took place on 31 January 2017 at which F.B. gave oral evidence; F.B. was one of the eye witnesses named in the applicant's initial criminal complaint, none of whom were interviewed by the police (see Annex 25). F.B. testified in court that the people in the store were beaten by police, who used the racial slur "Gypsy" (a word he was uncomfortable saying out loud in court).

24. On 27 January 2017 the applicant, together with the ERRC, filed a discrimination claim (Annex 24) against the Public Prosecutor's Office for refusing to conduct an effective investigation on the basis of applicant's ethnicity. The lawsuit was lodged with the Basic Court Skopje 2.

D. Police violence against Roma in Macedonia and impunity for acts of torture and ill-treatment

25. This case of police brutality against Roma does not appear to be an isolated incident in Macedonia. Various UN bodies have commented on the problem. The UN Human Rights Committee, in its 2015 concluding observations concerning Macedonia (CCPR/C/MKD/CO/3), expressed concern over reports of police brutality and excessive use of force by law enforcement officials, particularly against Roma and other minorities. The UN Committee Against Torture ("UNCAT") expressed specific concern over the incident described above (CAT/C/MKD/CO/3, § 14). UNCAT recommended that the Government ensure that all alleged cases of excessive use of force by law enforcement officials against Roma are promptly and effectively recorded and investigated and, as appropriate, prosecuted.

26. As the Court will of course be aware, in 2015 alone the Court delivered five judgments establishing violations of Article 3 by Macedonia, four of them due to lack of an effective investigation of instances of police brutality. The Court has delivered a total of eleven judgments concerning Article 3 violations by Macedonia, and in all of these cases the Court found a violation of a substantive and/or a procedural nature. While one case did not concern police brutality (Gorgiev (2012)), of the remaining cases, 40% involved police brutality against ethnic minorities (three against Roma: Jašar (2007), Dželadinov and others (2008), and Sulejmanov (2008); one against an Albanian: Hajrulahu (2015)).

27. The situation of Roma generally in Macedonia is poor. The Commissioner for Human Rights of the Council of Europe summed up the situation in his report (CommDH(2013)4) of a visit to the country in late 2012: "Most Roma continue to be trapped in a cycle of poverty and unemployment, residing in separate neighbourhoods which are often marked by unacceptable living conditions" (page 3). The Commissioner also noted discrimination by a particular sector of the police: border guards, who regularly engage in racial profiling to stop Roma from leaving the country (§ 101). The ERRC has published various materials on this particular problem and is currently collaborating with the Macedonia Young Lawyers' Association to litigate some twenty cases in the domestic courts concerning the issue.

28. Roma are residentially segregated, poor, and exposed to many forms of discriminatory treatment. Antigypsyism mixes with a climate of impunity for violence committed by law-enforcement agents in Macedonia to make Roma particular targets of police misconduct, including police violence. In the absence of specific data about police brutality and race, which the Macedonian authorities do not collect, the rest of this section sets out the evidence of that general climate of impunity.

29. The HCHRM conducted research into prosecution for the criminal offences of torture (Article 142 of the Criminal Code) and harassment while performing a public duty (Article 143 of the Criminal Code) for the period 2009-2015. Their statistics show that the Public Prosecutor's Office ("the PPO") dealt with 32 cases of alleged torture or inhuman and degrading treatment, yet only seven led to an investigation. Similarly, the PPO dealt with 138 cases related to harassment, yet in only 30 cases was an investigation formally carried out (leading to 22 indictments).

30. Similar evidence about the infrequent investigation of alleged ill-treatment by police can be drawn from data available on the website of the State Statistical Office in their annual report on perpetrators of criminal offences. Those data show that for the five-year period 2011-2015 the overall average indictment rate was 32.6% and average rejection rate for complaints was 15%. However, in relation to the criminal offence of harassment while performing a public duty (Article 143), only 25% (36 of a total of 144 complaints filed) resulted in an indictment and 58% (83) were rejected. The Statistical Office does not publish data for the criminal offence of "torture, inhumane and degrading treatment"; this is classified as "other".

32. The applicant explained in a notarised statement he gave for the purposes of his civil claims that police brutality and use of racist slurs against Roma in Topaana and other Romani neighbourhoods are common occurrences. See Annex 20.

F. Statement of alleged violation(s) of the Convention and/or Protocols and relevant arguments

59. Article invoked	Explanation
Protocol 12, Article 1, and/or Article 14 taken with Articles 3 and 5 § 1(c)	<p>The applicant complains that he has been a victim of a violation of Article 14 taken with the procedural and the substantive limbs of Article 3, as well as with Article 5 § 1(c): the police badly beat the applicant and detained him for 30 hours on grounds of his Roma ethnicity, and the authorities failed to conduct an adequate investigation into the applicant's beating and detention that was capable of unmasking any racist motive. Given the application of the Court's "beyond reasonable doubt" standard, however, combined with the failure of the authorities to conduct an adequate investigation, the applicant is reluctant to rely solely on Article 14 taken Article 3 and/or with Article 5 § 1(c). See, e.g., <i>Nachova and others v Bulgaria</i> (Grand Chamber, 2005), § 157. Indeed, although the Court should have no difficulty finding a violation of Article 14 taken with the procedural limb of Article 3 (see, e.g., <i>Balázs v Hungary</i> (2015), §§ 56-76), other elements of the Court's recent case law raise doubts for the applicant even on that point. See <i>Fogarasi and others v Romania</i> (Committee, 2017), §§ 108-109.</p>
	<p>For these reasons, to the extent that the Court does not feel it is appropriate to find violations of Article 14 taken with the procedural limb of Article 3, the substantive limb of Article 3, and/or Article 5 § 1(c), the applicant urges the Court to consider his complaints in the light of Article 1 of Protocol no.12.</p>
	<p>The applicant argues that he is a victim of institutional discrimination prohibited by Article 1 of Protocol no.12. The applicant was a victim of a widespread pattern of police misconduct, including police brutality, targeting Roma. The prosecutors' offices charged with investigating the police for that misconduct have failed, contrary to Article 1 of Protocol no.12, to take the necessary steps to investigate and combat that pattern of misconduct. The applicant argues, in the light of the widespread pattern of police misconduct against Roma set out in detail in section D of the statement of facts, that the burden shifts onto the Respondent State under Article 1 of Protocol no.12 to show that the ill-treatment and detention he experienced, and the failure to investigate them, were not discriminatory.</p>
	<p>The Court has rarely had the opportunity to interpret Protocol no.12 and never, as far as the applicant is aware, in the context of complaints of institutional racism by police. The applicant claims that Article 1 Protocol no.12 adds a significant dimension to his complaint of police misconduct. By agreeing to be bound by Protocol no.12, Macedonia accepted specific obligations to prohibit discrimination by all public officials and in respect of all rights protected by law. In accordance with the Court's ordinary way of interpreting the Convention and its protocols, Protocol no.12 must be seen as adding something more specific to the protection already provided by Article 14 taken with Article 3. See <i>Sharma v Latvia</i> (2016), § 78 ("in addition to the protection afforded by Articles 3 and 8... taken in conjunction with Article 13, aliens benefit from the specific guarantees provided for in Article 1 of Protocol No. 7"). The applicant claims that Macedonia's ratification of Protocol no.12 expanded the material scope of the prohibition on discrimination and amounted to an acceptance by Macedonia of more searching scrutiny from the Court when subject to claims of discrimination by public authorities.</p>
	<p>In relation to the expanded material scope of the prohibition on discrimination, the applicant claims that Article 1 of Protocol no.12 prohibits, inter alia, institutional racism by the police. The applicant submits that the information set out at section D of the statement of facts amounts to a prima facie case of institutional racism (specifically institutional antigypsyism) contaminating the police in Macedonia; given that prima facie case, and what happened to the applicant on 5-6 May 2013, the burden shifts to the Respondent State to show that the applicant was not a victim of discrimination. See,</p>

Statement of alleged violation(s) of the Convention and/or Protocols and relevant arguments (continued)

60. Article invoked	Explanation
Protocol 12, Article 1, and/or Article 14 taken with Articles 3 and 5 § 1(c) (continued)	<p>mutatis mutandis, D.H. v Czech Republic (Grand Chamber, 2007), § 209, finding that it was unnecessary to examine the individual cases of those affected by a widespread practice of discrimination in order to establish that they were victims of a violation of Article 14). The applicant appreciates that the notion of "institutional racism" has not been explored in the Court's case law. It is nonetheless a concept that can be found in Council of Europe documents (see, e.g., CRI(2011)37, page 3). The applicant urges the Court to adopt a definition of the concept used, notably, in the United Kingdom: "The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture, or ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people" (The MacPherson Report, 1999, § 6.34, available at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/277111/4262.pdf).</p>
	<p>In relation to the more searching scrutiny Macedonia accepted when ratifying Protocol no.12, and the question of the shift of the burden of proof, the applicant claims the following. When there are complaints against Respondent States that have ratified Protocol no.12, and those complaints concern police brutality against a member of an ethnic minority group, the burden of proof shifts onto the Respondent State to show that the incident and the failure to investigate it were not discriminatory when any of the following are present: any evidence that the incident was motivated by the victim's race (such as accusations of the use of a racial epithet by police); any evidence that the incident forms part of a broader pattern of discriminatory police misconduct (such as the evidence set out in section D of the statement of facts); or evidence of a pattern of a failure to investigate similar incidents (again, see section D of the statement of facts). The applicant notes that in the explanatory memorandum to Protocol no.12, "attention [was] drawn in particular to Article 53, under the terms of which 'Nothing in this Convention shall be construed as limiting or derogating from any of the human rights and fundamental freedoms which may be ensured under the laws of any High Contracting Party...' (§ 32). The shift of the burden of proof is a consistent feature of anti-discrimination legislation, such as Macedonia's legislation (see Article 38 of the Law on Prevention and Protection Against Discrimination) and European Union law which, by the time Protocol no.12 entered into force, had introduced a similar shift in the burden of proof across the European Union in respect of discrimination claims, setting the standard for Europe as a whole. See EU Directive 2000/43 of 29 June 2000, Article 8 § 1 ("when persons who consider themselves wronged because the principle of equal treatment has not been applied to them establish, before a court or other competent authority, facts from which it may be presumed that there has been direct or indirect discrimination, it shall be for the respondent to prove that there has been no breach of the principle of equal treatment"); see also EU Directive 2000/78 of 27 November 2000, Article 10 § 1. If the Court does not shift the burden of proof onto the Respondent State in the present case, then despite ratifying Protocol no.12, Macedonia - the nature of whose liability under the Convention more closely resembles civil, not criminal, liability - will be able to avoid the level of scrutiny provided for under generally accepted principles of anti-discrimination law, including its own anti-discrimination laws.</p>
	<p>In these circumstances, applying Article 1 of Protocol no.12, and/or Article 14 taken with the substantive and procedural limbs of Article 3 and Article 5 § 1(c), the applicant urges the Court to find that the police brutality and detention he experienced, and the failure to investigate them properly, amounted to discrimination contrary to the Convention.</p>

G. Compliance with admissibility criteria laid down in Article 35 § 1 of the Convention

For each complaint, please confirm that you have used the available effective remedies in the country concerned, including appeals, and also indicate the date when the final decision at domestic level was delivered and received, to show that you have complied with the six-month time-limit.

61. Complaint	Information about remedies used and the date of the final decision
Protocol 12, Article 1, and/or Article 14 taken with Articles 3 and 5 § 1(c)	<p>There has been no final decision in the case. The applicant is applying to the Court now because he has become convinced that the investigation into what happened to him has proved ineffective. He reached this conclusion following the last correspondence with the HPPO, notably the letter of 17 March 2017. In similar cases, the Court has found that the applicants exhausted domestic remedies as they had "made a criminal complaint to the public prosecutor, thereby initiating a procedure that was capable of leading to the identification and prosecution of the alleged perpetrators of the assaults". See, e.g., <i>Dzeladinov and others v Macedonia</i> (decision, 2007). The applicant notes that he explicitly raised discrimination in his criminal complaint, by complaining of breaches of Article 417 of the Criminal Code.</p> <p>The applicant is cognisant of his duty under the Convention to show diligence and interest in the pursuit of his complaint and seize the Court within a reasonable time of realising that the investigation is ineffective. See, <i>mutatis mutandis</i>, <i>Deari and others v Macedonia</i> (decision, 2012). He will of course continue to cooperate with any investigation that the BPPO or the HPPO may take forward, but he believes that the delays and other failures already caused by the BPPO have violated his rights under the Convention and prevented him from securing justice for the acts of discriminatory police brutality and detention he suffered.</p> <p>The applicant also notes that he has lodged domestic civil proceedings under Macedonia's anti-discrimination legislation (see above, statement of facts, section C). The applicant submits that these proceedings do not prevent the Court from examining this complaint. The applicant has already unsuccessfully exhausted one set of remedies by lodging a criminal complaint which has proved ineffective. As the Court has repeatedly found, "an applicant who has exhausted a remedy that is apparently effective and sufficient cannot be required also to have tried others that were available but probably no more likely to be successful". <i>Dzeladinov and others v Macedonia</i> (decision, 2007). Likewise, "in the absence of a criminal prosecution in connection with their complaints, the applicants were not required to embark on another attempt to obtain redress by bringing a civil action for damages". <i>Dzeladinov</i>. There is also no indication that a civil claim of the kind the applicant is bringing will succeed; there is no case law in Macedonia on the subject of which the applicant is aware.</p> <p>The applicant's appeal lodged on 12 April 2017 with the HPPO also does not prevent the Court from considering this complaint. Even if the HPPO decides to order the BPPO to take further steps to investigate, the applicant believes that the BPPO has already botched the investigation to such an extent that it can never be adequate. In the event that the Court considers that the appeal to the HPPO does constitute a further effective remedy, the applicant recalls that "La Cour... tolère que le dernier échelon des recours internes soit atteint peu après le dépôt de la requête, mais avant qu'elle soit appelée à se prononcer sur la recevabilité de celle-ci". <i>Karoussiotis v Portugal</i> (2011), § 57.</p>

I. List of accompanying documents

You should enclose full and legible copies of all documents. No documents will be returned to you. It is thus in your interests to submit copies, not originals. You MUST:

- arrange the documents in order by date and by procedure;
- number the pages consecutively; and
- NOT staple, bind or tape the documents.

68. In the box below, please list the documents in chronological order with a concise description. Indicate the page number at which each document may be found.

1.	Media report, 24vesti.mk, Обвинувања за прекумерна употреба на сила при апсења во Топаана, 6 Мај 2013	p.	1
2.	Photographs of the applicant's injuries, taken by the applicant, 7 May 2013	p.	4
3.	Medical certificate, general practitioner, private clinic, 7 May 2013	p.	10
4.	Decision on opening an investigation, Investigative judge Basic Court Skopje 1, 7 May 2013	p.	11
5.	Appeal against investigative judge's decision, 9 May 2013	p.	15
6.	Medical documentation: "8 September" Orthopaedic Clinic City General Hospital - Skopje, 9 May 2013 and 22 May 2013; psychiatrist's reports, 9, 13 and 27 May 2013	p.	18
7.	ERRC letter of concern, 13 May 2013	p.	25
8.	Criminal Council of Basic Court Skopje 1, rejection of appeal, 16 May 2013	p.	28
9.	Decision of the Basic Court Skopje 1 investigating judge, 10 June 2013	p.	30
10.	Complaint from the HCHRM to the DIC, 20 June 2013	p.	32
11.	Response from the DIC to the HCHRM, 5 July 2013	p.	34
12.	Response from the DIC to the ERRC, 15 July 2013	p.	40
13.	Complaint from the applicant's lawyer to the DIC, 10 September 2013	p.	46
14.	The DIC's response to the applicant's lawyer, 13 September 2013	p.	49
15.	Criminal complaint, 28 March 2014	p.	50
16.	Request to the BPPO from the applicant's lawyer, 1 September 2014	p.	55
17.	Decision of the BPPO rejecting the criminal complaint, 29 November 2014	p.	56
18.	Appeal against the BPPO's decision, 22 December 2014	p.	61
19.	Decision of the HPPO upholding the applicant's appeal, 18 February 2015	p.	65
20.	Notarised statement of the applicant, 1 March 2016	p.	67
21.	Request to the HPPO to take over the prosecution, 25 March 2016	p.	69
22.	Discrimination claim against the Ministry of Interior before the Skopje Basic Court 2, 15 April 2016	p.	71
23.	Urgent request to the HPPO from the applicant's lawyer, 21 October 2016	p.	76
24.	Discrimination claim against the Public Prosecutor's Office before the Skopje Basic Court 2, 27 January 2017	p.	78
25.	Minutes of the hearing in the applicant's civil claim against the Interior Ministry of 31 January 2017, with oral evidence given by F.B.	p.	83