

**HRVATSKI ULJUDBENI POKRET
CROATIAN CIVILIZATION MOVEMENT**

Association for human rights protection

10000 ZAGREB - Pete Poljanice 7

Tomislav Dragun, PhD.

Pete Poljanice 7 - 10000 ZAGREB

Zagreb, December, 27 2011.

MUNICIPAL CIVIL COURT IN ZAGREB

Ulica grada Vukovara 84

10000 ZAGREB

Applicants:

Hrvatski uljudbeni pokret, Croatian Civilization Movement

Zagreb, Pete Poljanice 7

Tomislav Dragun, PhD.

Zagreb, Pete Poljanice 7

Opponents of the applicants:

Delegation of the European Commission in the Republic of Croatia, Paul

Vandoren, Chief of the Mission, Zagreb, Trg žrtava fašizma 6

Republic of Croatia, Zagreb, Trg sv. Marka 2

State Election Commission, Zagreb, Visoka 15

Prof. Dr. Sc. Ivo Josipović, President of RH, Zagreb, Pantovčak 241

**REQUEST
FOR SUSPENSION**

in 5 copies

Ad 1.

Croatian Parliament decided that on January, 22 2012 will conduct a referendum about joining Croatia to EU membership.

Evidence attached:

Article "Croatian Parliament decided: the referendum about the European Union, January, 22 2012, www.politikaplus.com, December, 24 2011.

(2)

Ad 2.

Referendum about the Croatian joining the European Union will take place with the same list of voters, according to which held the election of representatives to the Croatian Parliament on December 3 and 4 2011, which means that it will participate in the referendum and **701,711 non-existent voters**.

All that makes this referendum irregular and disgraceful.

Ad 3.

Specifically, **on December, 5 2011** we submitted to a Municipal Civil Court a lawsuit to annul the election of representatives to the Croatian Parliament held on December 3 and 4 2011 with the participation of the mentioned **701,711 non-existent voters**.

Evidence attached:

Accusation, Civil County Court in Zagreb, December, 5 2011.

Ad 4.

In addition to that on December, 20 2011 we submitted a request for suspension, which states:

The constitution of the Croatian Parliament is postponing and the mandate to form the Government is canceled, which is December, 14 prof. Dr. Sc. Ivo Josipović, President of the Republic of Croatia, gave to Zoran Milanović for the composition of the Government, following the results of the election of representatives, which were held on December 3 and 4 2011 until our claim for the annulment of the elections from December, 5 2011 is resolved (renovated December, 19 2011) or according to the request of the other plaintiffs for an interim measure applied to the County Court in Zagreb from November, 11 2011 and other plaintiff's lawsuit applied to the Administrative Court of Croatia of November, 17 2011.

(3)

Ad 5.

Therefore, we are suggesting to the title court decision of the following

TEMPORAL MEASURE

Postpone the referendum about joining the Croatia in the European Union until a credible list of Croatian voters is made.

HRVATSKI ULJUBENI POKRET
CROATIAN CIVILIZATION MOVEMENT

Tomislav Dragun, PhD.
President

Tomislav Dragun, PhD.
Personally