

**INTERIM ADMINISTRATION OF KOSOVO  
ADMINISTRATA E PËRKOHSHME E KOSOVËS  
PRIVREMENA ADMINISTRACIJA KOSOVA**

District Public Prosecutor  
Prizren

HEP Nr. 26/2004


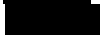

27 July 2006

**To: District Court of Prizren**

Pursuant to Article 304 and 305 of the Provisional Criminal Procedure Code of Kosova (PCPC), Paul Flynn, International Prosecutor of the District Court of Prizren, files this:

**AMENDED INDICTMENT**

Against:

- |   |  |
|---|--|
| 1. First name and surname:              | Selim Krasniqi   |
| Nickname:                               | “Celiku”   |
| First name and surname of father:       |  Krasniqi |
| Mother’s first name:                    |           |
| Mother’s maiden name:                   |           |
| Ethnicity:                              | Kosovar Albanian   |
| Citizenship:                            | Yugoslavia   |
| Date of birth:                          | 1 April 1970   |
| Place of birth:                         | Vllashkidrenovc, Malisheve/<br>Municipality of Malisheva                                     |
| Place of residence:                     | Ortakoll, Prizren  |
| Civil status:                           | Married, two children  |
| Profession:                             | Commander of RTG2 – TMK, Prizren,<br>Brigadier general                                       |
| Education level:                        | Secondary school, high school of   |
| economy,                                | attending last year of studies   |
| Financial status:                       | Average economic status  |
| Personal identification number:         | KPC # 00624  |
| Other criminal proceedings in progress: |  |
| Previous convictions:                   | No   |
| Custody and Chapter:                    | In detention as of February 16, 2004   |

2. First name and surname: Bedri Zyberaj  
Nickname:  
First name and surname of father: [REDACTED] Zyberaj  
Mother's first name:  
Mother's maiden name:  
Ethnicity: Kosovar Albanian  
Citizenship: Yugoslavia  
Date of birth: 6 May 1963  
Place of birth: Gjakove  
Place of residence: Prishtine, Lakrishte neighborhood, Nr. 24, entrance 3, sixth floor  
Civil status: Married, four children  
Profession: Protocol officer, TMK General  
Headquarters in Prishtina, Lieutenant Colonel  
Education level: Master in Albanian Literature  
Financial status: Poor economic status  
Personal identification number: KPC # 00010  
Other criminal proceedings in progress:  
Previous convictions: No  
Custody and Chapter: In detention as of February 16, 2004
3. First name and surname: Islam Gashi  
Nickname:  
First name and surname of father: [REDACTED] Gashi  
Mother's first name:  
Mother's maiden name: [REDACTED]  
Ethnicity: Kosovar Albanian  
Citizenship: Yugoslavia  
Date of birth: 22 Janar 1974  
Place of birth: Village Drenovc, Municipality of Rahovec  
Place of residence: same as above  
Civil status: Single  
Profession: Major in TMK,  
Education level: Secondary school in mathematics,  
Financial status: Poor economic status  
Personal identification number:  
Other criminal proceedings in progress:  
Previous convictions: No  
Custody and Chapter: In detention as of 24 May 2004
4. First name and surname: Agron Krasniqi  
Nickname: Goni  
First name and surname of father: [REDACTED] Krasniqi

Mother's first name:	██████████
Mother's maiden name:	██████████
Ethnicity:	Kosovar Albanian
Citizenship:	Kosovar Albanian
Date of birth:	25 October 1977
Place of birth:	Village Dejne/Denjane, Municipality of Rahovec
Place of residence:	CH 8180, Zurich, Beulach, Lindenhof
Street	Nr. 4A, Switzerland
Civil status:	Married, one child
Profession:	Driver
Education level:	Secondary school,
Financial status:	Average economic status
Personal identification number:	Unknown
Other criminal proceedings in progress:	None
Previous convictions:	No
Custody and Chapter:	In detention as of December 9 <sup>th</sup> , 2005

## **Because**

### Legal claims

1. International prosecutor files this Indictment against Selim Krasniqi (nickname "Celiku"- "Steel") Bedri Zyberaj, Islam Gashi and Agron Krasniqi ("the codefendants"), who are accused of committing war crimes under Article 142 of the Criminal Code of Yugoslavia (CCY) in conjunction with Articles 24, 30, 22 and 26 of the CCY, committing, aiding, committing by omission, acting in complicity with others and participating in a joint criminal enterprise with the purpose of committing war crimes. It is supposed that the codefendants are personally responsible for unlawful arrest, detention, beating and torture of Kosovo Albanian victims in this case.
2. During the time frame covered by this Indictment, there was a situation of internal armed conflict between the Kosovo Liberation Army ("KLA") and the Federal Republic of Serbia and the Federal Republic of Yugoslavia, including the Yugoslav Army ("YA"), the Ministry of Interior of the Federal Republic of Yugoslavia ("FRY"), the forces of the Ministry of Interior of the Republic of Serbia and Serb paramilitary soldiers in Kosovo. Both parties in the conflict were under the respective commands, exercising control over parts of the territory of Kosovo which enabled them to conduct continued and focused military operations.
3. Offenses laid down in Article 142 of the CCY and listed in this indictment constitute war crimes, because each of these identified offences constitutes a violation of applicable international law, including Article 3 common to the four Geneva Conventions of 1949 which applies in cases of internal conflicts; Hague Conventions of 1899 and 1907, four Geneva Conventions of 1949 and the Second Additional Protocol of 1977 to the Geneva Conventions of 1949, applicable in cases of internal armed conflicts.

4. Article 142 of the CCY represents the applicable law in Kosovo because the UNMIK regulation 1999/24 stipulates that the applicable legislation in Kosovo is the law that was in force in Kosovo on March 22<sup>nd</sup>, 1989. In accordance with the requirements of Article 181 of the Constitution of the Socialist Federal Republic of Yugoslavia of 1974, which is part of the applicable legislation in Kosovo, offenses and criminal convictions can be based solely on the provision that defines the criminal offence and threatens punishment; whereas Article 142 of the CCY defines war crimes against the civilian population and threatens punishment for these crimes.

5. All victims of war mentioned in the charges contained in this indictment are clearly members of the civilian population, as stipulated by Article 142 of the CCY and according to the international law mentioned above.

6. There is a connection between war crimes committed, included in this indictment, and internal armed conflict. The existence of armed conflict has played a great role because it has made it possible for the co-defendants to carry out the offences and their actions are directly linked to the armed conflict.

7. Acts of the co-defendants occurred at a time when there was an armed conflict taking place in Kosovo.<sup>1</sup>

8. Co-defendants, as perpetrators of war crimes, acted on behalf of the KLA and were closely linked to them, making them parties to the conflict. The KLA declared itself a legitimate army on 15<sup>th</sup> or 16<sup>th</sup> of May 1998.

9. In case of disagreement on whether the said offences constitute war crimes, the prosecution invites the court panel to find the co-defendants guilty of other material individual offences and reserves the right to amend the indictment accordingly.

### **FACTUAL BACKGROUND**

10. A state of war existed in Kosovo during the time frame covered by this indictment. All acts and omissions of the defendants were part of a widespread and systematic attacks directed against the Serbian population and Albanians who were thought to be associates of the Serbian police and military forces or its civil administration.

11. Throughout the period covered by the indictment Selim Krasniqi, Bedri Zyberaj, Islam Gashi and Agron Krasniqi were required to adhere to the rules and customs of war, including Article 3 common to the four Geneva Conventions of 1949, applicable to internal armed conflicts; Hague Conventions of 1899 and 1907, four Geneva Conventions of 1949 and Additional Protocol II of 1977 to the Geneva Conventions of 1949, applicable to internal armed conflict.

12. All co-defendants knowingly and willfully participants in this joint criminal enterprise, having a common goal, or being aware of the consequences provided for the implementation of the objective of the joint criminal enterprise. On this basis, they bear individual criminal responsibility for the crimes in question, in addition to their responsibility for planning,

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<sup>1</sup> See the paragraph 69 of ICTY, Indictment Case number Nr. IT-99-37-PT (against Milosevic and others); Indictment Case number Nr.-IT-03-66-PT (against Limaj and others)

instigating, committing or otherwise aiding in the planning, preparation, execution and commission of these crimes.

13. All of the victims mentioned in this indictment were chosen by the perpetrators based on suspicion of collaboration with the Serbian police, military or civil administration. At the time of the commission of criminal offences the defendants were aware that the victims were civilians, as defined in Article 3 (1) of the Geneva Convention with regard to the protection of civilians in time of war (12 August 1949), that is, "persons who do not participate directly in the hostilities, including members of armed forces who have lowered their weapons and those who have come out of the fight due to illness, injury, detention or any other cause."

14. During the period May 1998 - October 1998, members of the KLA established and ran a detention center ("Detention Center") in the village Drenovc in Zatriq, Rahovec. There was a KLA policy which resulted in the arrest, interrogation, detention, beating, torture and, in some cases, killing of Kosovo citizens of Serb nationality who were not involved in the conflict and the Kosovo Albanians who were suspected of collaborating with Serbian authorities. In general, they were detained and held in inhumane conditions, where they were denied proper hygienic conditions, food, water and medical care. They were subjected to beatings and torture.

15. Co-defendants, in collaboration with the guards and other KLA soldiers and in a joint criminal enterprise, unlawfully arrested several Kosovo Albanian civilians and sent them to the detention center where they were illegally detained, tortured and killed. One of the purposes of this detention center was to detain Kosovo Albanian civilians who were suspected of collaborating with Serbian authorities and to punish them for allegedly not being loyal to the KLA. A number of victims were taken against their will from their families and were brought to the Detention Center, or were detained after showing up at the Detention Center on several occasions.

16. In this case we have seven main victims. Their illegal arrests took place on the following dates:

i. Sh■■■■ Sh■■■■ was illegally arrested on June 2, 1998. He, along with H■■■■ M■■■■ and F■■■■ H■■■■, went to the KLA headquarters in Drenovc on June 2, 1998. M■■■■ and H■■■■ were allowed to return home by the KLA soldiers and guards whereas Sh■■■■ Sh■■■■ was arrested and detained illegally.

ii. B■■■■ B■■■■ was illegally arrested on June 3, 1998 by M■■■■ L■■■■, R■■■■ Q■■■■ K■■■■ and N■■■■ K■■■■, according to G■■■■ P■■■■'s orders (nickname "Rreziku" ("Danger"), now deceased), which at the time was the commander of the Military Police in Drenovc. Witnesses of this illegal arrest were Islam Hoti and Witness B. A witness has seen B■■■■ B■■■■ in the Detention Center with swollen cheeks on June 5<sup>th</sup> or 6<sup>th</sup> 1998. Likewise, the witness A has seen B■■■■ B■■■■ in the Detention Center in July 1998, who looked very pale and had his clothes covered by dried blood.

iii. H■■■■ K■■■■ was illegally arrested on 4 June 1998 by KLA soldiers, one of whom was Islam Gashi. Witnesses TT and N have seen H■■■■ K■■■■ in the Detention Center.

iv. H■■ P■■ was illegally arrested on 7 June 1998. M■■ P■■ has seen H■■ P■■ in the Detention Center. The witness A, who was also detained illegally, was put in the same cell with H■■ P■■ and has seen him for the last time in June 1998 covered in blood. Another witness, witness O, has seen H■■ P■■, but this time in the detention center in Malishevë.

v. M■■ Rr■■ was illegally arrested on 10 June 1998 by three KLA soldiers in black uniforms, two of whom were Agron Krasniqi and Z■■ B■■. They took him from the courtyard of his house. This abduction was observed by witnesses N■■ Rr■■ and H■■ Rr■■. Witness X has heard M■■ Rr■■ as he was being beaten in the detention center.

vi. H■■ T■■ was illegally arrested on 2 July 1998 by four KLA soldiers guarding a checkpoint in the streets to Drenovc and Pataqan, one of whom was Xh■■ E■■. H■■ T■■ was with Z■■ T■■ when he was stopped at the checkpoint in question. A nephew of H■■ T■■ who visited him at the Detention Centre was told by the soldiers that: "We are interrogating him right now, and his brother Z■■ should come to pick him up, not you guys."

vii. A■■ B■■ was illegally arrested on 13 July 1998 by seven KLA soldiers in his house. They told his family members that they just want to ask him some questions and after that he will be released. When M■■ B■■ went to Drenoc he was told that A■■ B■■ was held by the KLA in the old school before being sent to Drenica.

#### **CLARIFICATION OF REASONS FOR FILING THIS INDICTMENT**

(Under Article 305 (1) (5), PCPCK)

Between May 1998 and October 1998, members of the Kosovo Liberation Army (KLA) established and ran a detention facility in the village Drenovc in Zatriq, Rahovec ("Detention Center"). There was a policy led by the KLA which resulted in the arrests, interrogations, detentions, beatings, tortures and, in some cases, killings of Kosovo citizens of Serb nationality who were not involved in the conflict and the Kosovo Albanians who were suspected of collaborating with Serbian authorities. KLA established a Detention Center where were held in "isolation" those who were suspected of collaborating with Serbs. A number of victims were taken against their will from their families and were brought to the Detention Center or were detained after showing up in the Detention Center on several occasions.

18. A number of witnesses gave their depositions claiming that the following victims were arrested or kidnapped and taken to the Detention Center between June-July 1998, and they have gone missing ever since:

- i. Sh■■ Sh■■ (missing, thought to be dead)
- ii. B■■ B■■ (found dead in 2005)
- iii. H■■ K■■ (missing, thought to be dead)
- iv. H■■ P■■ (found dead in 2005)
- v. M■■ Rr■■ (missing, thought to be dead)

vi. H■■ T■■ (found dead in 2005)

vii. A■■ B■■ (missing, thought to be dead)

In addition to this, some of the aforementioned witnesses have testified that they were arrested or stopped, or beaten or tortured by one or more of the defendants. Witnesses who have made such claims are witnesses "A", "E", "O", "U", "W" and "X".

19. On June 2<sup>nd</sup>, 1998, Sh■■ Sh■■ along with H■■ M■■ and F■■ H■■ went to the KLA headquarters in Drenovc with Sh■■ Sh■■'s vehicle. Sh■■ was stopped by KLA soldiers while H■■ M■■ and I■■ H■■ were allowed to return home. On June 3 or 4 1998, R■■ Sh■■, Sh■■'s father, accompanied by H■■ M■■, went to the Detention Center looking for his son. They were not allowed to visit him. The same thing happened with his second attempt to visit his son, three days later; again, R■■ Sh■■ didn't manage to see his son. However, someone from the Headquarters told him that: "Sh■■ is no longer here, he is in Drenica." R■■ Sh■■ noticed Sh■■'s vehicle parked outside the KLA headquarter. He has never seen Sh■■ Sh■■ after June 2<sup>nd</sup>, 1998.

20. R■■ Sh■■, his wife S■■ Sh■■ and M■■ Sh■■, wife of Sh■■ Sh■■, all testified that H■■ M■■ had told them that Sh■■ Sh■■ was detained in the Drenovc Detention Center. Also, M■■ told S■■ Sh■■ that he had seen a number of KLA soldiers there, among them the codefendant Selim Kraniqin (Celiku) and Bedri Zyberaj. All three of them have testified that M■■ had told them that these defendants were responsible for the detention of Sh■■ Sh■■. H■■ M■■ has denied to have said this in his testimony. S■■ Sh■■ met I■■ G■■ in Rahovec, who told the witness that 38 prisoners from Drenovc, including Sh■■ Sh■■, were sent to Malisheva on June 20, 1998.

21. Three (3) days after his release, the witness "A" testified that on June 4, 1998, he was en route to the Detention Center in search of B■■ B■■, when he was stopped by some KLA soldiers who asked for his identification document. A KLA soldier sent his ID to the headquarters and soon after three other soldiers arrived. One of them was Celiku, the other was Islam Gashi and a third person. They took the witness "A" to the KLA headquarters where he was punched and kicked by Celiku and another person, while Islam beat him with a stick which had a wire wrapped around it. In the second or third day of his illegal detention, witness "A" was taken out of the prison by two (2) KLA military police officers wearing black uniforms. After about 100 meters, the witness "A" noted B■■ B■■, Sh■■ Sh■■ and some guy named Hysen from the village of Dejn coming out of another door that was opened by the KLA guards at that moment. The guards followed them up a hill towards the wells and they were told they could wash their faces if they wanted. Witness "A" noticed that B■■ B■■'s cheek was swollen, while Sh■■ Sh■■ and H■■ were all in blood. Thirty minutes later, they brought them back into their prison cells. On the third day, the witness "A" was released.

22. Three days after the release of the witness "A" he was again illegally arrested for the second time and taken to the Detention Center in Drenovc, where he was kept in the same room with H■■ P■■, whom he knew for a long time. He noted that H■■ P■■ was covered in blood. The next day they brought Sh■■ Sh■■ into their room, also covered in blood. Later that day, the very same three (3) KLA soldiers who had earlier beaten him, wearing black uniforms, got into the room and started beating Sh■■ Sh■■. After beating him badly, they beat the witness

“A”, who clearly remembers how his blood spattered the ceiling after being kicked by one of the soldiers.

23. On June 3, 1998, B [REDACTED] B [REDACTED] was unlawfully arrested in his uncle’s house, Islam Hoti, in the village of Ratkoc (municipality of Rahovec) by the KLA soldiers M [REDACTED] L [REDACTED], R [REDACTED] Q [REDACTED] K [REDACTED] and N [REDACTED] K [REDACTED], following orders of G [REDACTED] P [REDACTED] (nickname “Rreziku”, now deceased), who at the time was the commander of the Military Police in Drenovc. I [REDACTED] H [REDACTED] and witness B have been present during this illegal arrest. As described in paragraph 21 above, the witness “A” had seen B [REDACTED] B [REDACTED], who had his cheeks swollen, in the Detention Center on June 5<sup>th</sup> or 6<sup>th</sup> 1998. That was the last time the witness “A” saw B [REDACTED] B [REDACTED].

24. Likewise, another witness, the witness “B” has seen B [REDACTED] B [REDACTED] looking very pale in the face and with his clothes covered in blood, in the Detention Center in July 1998. Witness B gave him clothes to change. His bloodied clothes were taken from the witness “B”, who handed them over to the International Police investigators for DNA examination. She testified before the court that people from the area had informed her that Selim Krasniqi and Bedri Zyberaj were the persons who should be contacted at the KLA headquarters. Witness B testified before the investigating judge and the court that she had seen Bedri Zyberaj several times in the Detention Center during June-July 1998, when the witness B tried to visit B [REDACTED] B [REDACTED]. That was the last time Witness B saw B [REDACTED] B [REDACTED].

25. On 4 June 1998, H [REDACTED] K [REDACTED] was taken from his home by the KLA soldiers A [REDACTED] K [REDACTED], Z [REDACTED] B [REDACTED], Islam Gashi and uncle's son of Islam Gashi. The next day, the witness TT and N went to the detention center looking for H [REDACTED] K [REDACTED] and managed to talk first with I [REDACTED] G [REDACTED], then with Selim Krasniqi who told them to go to Bedri Zyberaj. Witnesses saw the victim a few weeks after his illegal arrest in a room in the detention center which was also attended by a number of KLA soldiers, among them Selim Krasniqi and Islam Gashi.

26. During the investigation, witness “TT” recalled that he went to speak with Bedri Zyberaj, as suggested by Selim Krasniqi. Bedri Zyberaj told them they should talk to Selim Krasniqi "because it is within his competence. He is the commander of the police." Witness TT declared that Bedri Zyberaj was "political commissar" whereas Selim Krasniqi was the commander of the Military Police, a post which he received from G [REDACTED] P [REDACTED] after the latter was killed on 18 July 1998.

27. Witness “N” verified in whole the statements of witness TT. He further declared that when he finally saw the victim, H [REDACTED] K [REDACTED], approximately five (5) weeks after his illegal arrest, he was in a very serious condition. He gave a statement to the police and testified before the investigating judge that the defendant Islam Gashi had been present when he met with H [REDACTED] K [REDACTED]. H [REDACTED] was wearing the same clothes that he was wearing the day he was illegally arrested. G [REDACTED] P [REDACTED], known by the nickname Rreziku ("Danger") told witness N that they were the first people allowed to visit the detainee. The witnesses “TT” and “N” have seen H [REDACTED] K [REDACTED] for the last time precisely in the Detention Center. Defendant Selim Krasniqi admitted during the proceedings that he recalls to have seen H [REDACTED] K [REDACTED] as he was being brought in the old school building.

28. On 7 June 1998, H [REDACTED] P [REDACTED] was illegally arrested and detained in the Detention Center. A day before the arrest, his son, M [REDACTED] P [REDACTED] went to the Detention Centre along with H [REDACTED]



D■■, to find out if their names were on a "black list". M■■ P■■ was detained by the KLA soldiers. They instructed H■■ D■■ to tell H■■ P■■ to show up in the Detention Centre if he wanted his son to be released. As instructed, H■■ P■■ went to the Detention Center where he was illegally detained while his son was released.

29. On June 16, 1998, witness "Z" and H■■ D■■ went to the detention center to pay a visit to H■■ P■■. He managed to speak with Z■■ B■■ who instructed him to go to the KLA headquarters and ask for Bedri Zyberaj. Bedri told them to go to the military police and seek "Danger" (the nickname of G■■ P■■). "Danger" was the one who confirmed to the witness "Z" that H■■ P■■ was in their custody. While in the detention center he saw H■■ handcuffed or shackled and the defendant Agron Krasniqi was following him from behind. "Danger" told witness "Z" that if they could bring them N■■ P■■ they would release H■■ P■■. Witness "Z" did not accept the proposal of P■■.

30. Afterwards, witness "Z" and H■■ D■■ went back to the Detention Center and met G■■ "Rreziku" P■■, Selim Krasniqi (Celiku) and another military police officer. Selim Krasniqi (Celiku) talked with them. Witness "Z" told Selim Krasniqi that they could not bring N■■ P■■ as ordered by "Rreziku". Selim Krasniqi replied: "This condition stands and if you bring that person, you can take H■■"

31. M■■ P■■ managed to visit H■■ P■■ in a room in the Detention Center. H■■ gave his denture to M■■ in order to get it fixed. Following a brief meeting, M■■ walked out of the room and heard Bedri Zyberaj saying: "I would not have allowed H■■ to see them, but I allowed them to see H■■". Three (3) days later, witness "Z" and H■■ went again to the Detention Center to return H■■ his denture, but they were told that H■■ was sent to Malishevë when Serbian police had bombed Drenovc.

32. Witness "O" testified that he was illegally arrested in July 1998 and was detained in a very large building in Malishevë where he was beaten repeatedly until he lost consciousness. When he recovered consciousness, he found himself in a room with three (3) other prisoners who were in a critical condition. The persons in question were H■■ P■■, a guy named H■■ and H■■. These prisoners told him that they were from Drenovc and they have been beaten up many times.

33. On June 10<sup>th</sup>, 1998, M■■ Rr■■ was arrested in his house by three (3) persons in black uniforms, two (2) of whom were identified as Agron Krasniqi and Z■■ B■■. The next day, N■■ Rr■■ and H■■ Rr■■ went to the school of Drenovci village where they met Z■■ B■■. When confronted, Z■■ told them that M■■ had been locked in the basement and if they wanted to know more about him they should speak with Bedri Zyberaj. Bedri Zyberaj confirmed to them that he was responsible for the arrest of M■■ Rr■■ and that they should visit him and leave.

34. During their visits to the Detention Center, N■■ Rr■■ and H■■ Rr■■ saw Islam Gashi, Agron Krasniqi and Z■■ B■■ there, while Bedri Zyberaj was seen in an office of the KLA headquarters, located in the building of the agricultural cooperative in the village Drenovc. Further, N■■ Rr■■ testified that during one of their visits to the Detention Center they had heard the howl of people coming from the basement that had metal doors and windows with steel grills.

35. On July 2<sup>nd</sup>, 1998, H [redacted] T [redacted] and Z [redacted] T [redacted] were going to a wedding. They were stopped at a KLA checkpoint guarded by four (4) armed KLA soldiers at the road towards Drenovci and Paragan. They took their identification documents. Later on one of the KLA soldiers came and asked who H [redacted] T [redacted] was? H [redacted] identified himself. Three (3) hours later a car "Lada Karavan" arrived and picked up him. The KLA soldiers then told Z [redacted] T [redacted] that he could get Hazer the next day at 8:00 in the morning. However, Z [redacted] T [redacted] did not show up the next day because he was afraid.

36. A H [redacted] T [redacted]'s nephew tried to contact him, but the KLA soldiers informed him that: "Hazer was being interrogated, and his brother Z [redacted] should come to take him home." Witness "X" testified that he had been arrested and taken to the Detention Centre in Drenovc, where he had seen H [redacted] and M [redacted] Rr [redacted] and had heard their screaming while they were being beaten.

37. On July 13<sup>th</sup>, 1998, A [redacted] B [redacted] was abducted from his home by seven (7) KLA soldiers who told his family they were just going to ask him some questions and will release him later. Since A [redacted] did not come back, M [redacted] B [redacted] went to Drenovc to ask for him. There he met Bedri Zyberaj, who, he heard, was the political "commissioner" responsible for the KLA headquarter. Bedri Zyberaj told him to go to the police station which was located in the school building and ask for "Celiku".

38. In the school building, M [redacted] B [redacted] met a KLA soldier named I [redacted] B [redacted] who said he had given A [redacted] water and other necessary things he needed. While the two were talking, a person named "Celiku" had arrived. I [redacted] B [redacted] informed M [redacted] B [redacted] that "Celiku" was the main person responsible for the military police. I [redacted] B [redacted] also told him that Celiku's real name is Selim Krasniqi.

39. M [redacted] B [redacted] approached Selim Krasniqi and asked him about A [redacted] B [redacted]'s whereabouts. Selim replied that A [redacted] is not Drenovc, but in Drenica. Witness could not go there due to poor conditions on the roads. The witness further stated that Selim admitted he was responsible for detainees.

40. At all times covered this indictment, especially from 28 April to June 1998 and some time in July and August 1998, Selim Krasniqi was stationed at the KLA headquarters in the village of Drenovc. According to evidence gathered during the judicial investigation, it seems that Selim Krasniqi held a senior rank, or was the person with power or had a responsible position in the KLA headquarters and /or the detention center stationed in the village of Drenovc. This is shown with the following:

40.1 Witness "TT" testified that Selim Krasniqi was the commander of the Military Police, a post which he received from G [redacted] P [redacted], after the latter was killed on 18 July 1998.

40.2 Witnesses who went to the Detention Center in search of victims were directed by the KLA soldiers who guarded the compound to either Selim Krasniqi or Bedri Zyberaj.

40.3 Upon failure to meet H [redacted] K [redacted] in the Detention Center, witnesses N and TT were allowed to finally meet him only after they talked to Selim Krasniqi.

40.4 When witness M [redacted] B [redacted] went to the Drenovci village looking for A [redacted] B [redacted], he saw Badri Zyberaj sitting in front of a computer and two (2) KLA soldiers near him, in a

small house belonging to the cooperative vineyards. Bedri Zyberi instructed them to contact Selim Krasniqi.

40.5 When witness "TT" went to the Detention Center in search of H■■■■ K■■■■, Selim Krasniqi directed him to Bedri Zyberaj. On the other hand, Bedri advised him to talk to Selim, saying: "This is his responsibility. He is the commander of the police." Further, when a loud debate broke out between the witness TT and Agron Krasniqi, during one of his visits, Selim approached them and ordered Agron: "You go do your job".

40.6 In July 1998, witness "U" was interrogated for four (4) hours by Selim Krasniqi. Selim ordered Agron Krasniqi and Z■■■ B■■■■ to beat him in another room "or tell him how things should be from now on." Further, witness "U" stated that he had learned from some KLA soldiers that Selim Krasniqi was the chief of the office.

41. Evidence suggests that in some cases Selim Krasniqi had personally participated in the beating and torture of the victims.

41.1 On 19 August 1998, the son of witness "Ë" was stopped and arrested by the Serbian police. He was mistreated and detained for 4 hours before they let him go. Two days later the boy was questioned by the KLA soldiers about what he had told the Serbian police and why he had been released? He was beaten by Selim Krasniqi in the village school building in Drenovc. When the boy got back home, he told his father (witness "Ë") that they were expecting him at school the next day at 9:00 in the morning. Witness "Ë" showed up at the school as he was told by his son. Upon arrival at the school building, Selim Krasniqi called him a traitor and accused him of giving food to the Serbs. Selim Krasniqi slapped him so hard that he fell off the chair.

41.2 In May 1998, witness "E" was driving in his car in the direction of the Drenovci village when he was stopped by a KLA soldier. After a while there came Selim Krasniqi and G■■■ P■■■■. Having emerged from the car Selim Krasniqi bound the victim and struck him twice with the butt of the Kalashnikov. He was then taken to a wooden building, where he noticed Badri Zyberaj, and later he was taken to the basement of another building where he was illegally detained and held for three and a half days without food and water.

41.3 On 4 June 1998, and then on or around 10 June 1998, the witness "A" was detained in the KLA headquarters where he got beaten by punches and kicks by Selim Krasniqi.

42. Therefore, Selim Krasniqi, acting in co-perpetration with other co-defendants in the implementation of a joint criminal enterprise, was personally responsible for and involved in the illegal arrest and detention of civilians and keeping them in inhumane conditions. Selim Krasniqi, in collaboration with his codefendants and other unidentified persons, also participated in the interrogation and torture of detained civilians.

43. At all times covered by this indictment, especially from March 1998, Bedri Zyberaj was a member of the KLA and was stationed at the KLA headquarters in the village of Drenovc. From the evidence gathered during the criminal investigation, it appears that Bedri Zyberaj held a high rank or was a person with power or had a responsible position in the KLA headquarters and / or the detention center in the village of Drenovc. This is shown with the following:

43.1 Witnesses "TT", N [REDACTED] Rr [REDACTED] and M [REDACTED] B [REDACTED] testified that Bedri Zyberaj was called a political commissioner.

43.2 Witness "Z" was directed by Z [REDACTED] B [REDACTED] to meet with Bedri Zyberaj when he went to visit H [REDACTED] P [REDACTED] in the Detention Center.

43.3 When M [REDACTED] B [REDACTED] K went to the village of Drenovci in search of A [REDACTED] B [REDACTED], he saw Badri Zyberaj seated in front of a computer with two (2) KLA soldiers near him, in a small house belonging to the cooperative vineyards. Bedri Zyberaj told him to discuss this issue with Selim Krasniqi.

43.4 Bedri Zyberaj was the person who led the interrogation of witness "E". After being held for three (3) days, Bedri Zyberaj ordered the witness to go home and not to tell anyone what had happened.

43.5 When N [REDACTED] Rr [REDACTED] and H [REDACTED] Rr [REDACTED] inquired about M [REDACTED] Rr [REDACTED], Bedri Zyberaj claimed that he had been the one who arrested M [REDACTED] although he was not present at the time of his abduction.

43.6. Witness "D" testified that Bedri Zyberaj had issued an order to pick up a corpse that was confused for that of H [REDACTED] P [REDACTED] and bring it to Drenovc and then sent it to the police station in Rahovec.

44. Evidence suggests that in some cases Bedri Zyberaj was personally involved in the beating and torture of the victims.

44.1. Bedri Zyberaj visited the witness during his illegal detention in the basement. Bedri took out a gun from his belt and pointed it toward the witness' "E" chest. I [REDACTED] G [REDACTED] urged Bedri to shoot, saying: "shoot this person because he is a Serb collaborator...and I do not know him at all." After what seemed like an endless time of mental torture and harsh terror, witness "E" felt a temporary relief when Bedri and I [REDACTED] left the room. But his recovery was short-lived because a few moments later two (2) persons entered the room beating him with wooden sticks until he passed out.

45. Therefore, Bedri Zyberaj, acting in co-perpetration with other co-defendants in the implementation of a joint criminal enterprise, participated in illegal arrest and detention of civilians, keeping them in inhumane conditions. Also, Bedri Zyberaj, in collaboration with his co-defendants and other unidentified persons took part in the interrogation and torture of detained civilians.

46. At all times covered by this indictment, Islam Gashi has been a member of the KLA military police in the village of Drenovc. As a member of the KLA military police, acting in collaboration with other co-accused and other unidentified individuals, Islam Gashi participated in the illegal detention, interrogation and torture of detained civilians by implementing illegal orders of his superiors (now codefendants). Several witnesses saw I [REDACTED] G [REDACTED] take part in kidnappings acting in capacity of a guard at the detention center.

47. Evidence suggests that, in one case, Islam Gashi was directly involved in the beating and torture of the victims.

47.1. On June 4, 1998, the witness "A" was beaten by Islam Gashi, who used a stick wrapped with wire around it. On or around 10 June, the witness "A" was brought back to the KLA headquarters in Drenovc where he was again beaten by Islam Gashi.

48. At all times covered by this indictment, Agron Krasniqi has been a member of the KLA in the village of Dej and Drenovc. Agron Krasniqi, as a member of the KLA, acting in complicity with the codefendants and other unidentified persons, participated in the arrest, detention, interrogation, torture and beating of detained civilians. Various witnesses have seen Islam Gashi act as a guard at the detention center, whereas Agron Krasniqi has participated in the following:

48.1. On June 4, 1998, H■■■■ K■■■■ was abducted from his home by Agron Krasniqi, Z■■■■ B■■■■, Islam Gashi and another person. Kidnapping was witnessed by anonymous witnesses N and TT. Agron Krasniqi and Islam Gashi were also seen by witness "Z" at the Detention Center when they had gone there to visit H■■■■ P■■■■.

48.2. On June 10, 1998, M■■■■ Rr■■■■ was kidnapped in his courtyard by Agron Krasniqi. Kidnapping was witnessed by N■■■■ Rr■■■■ and H■■■■ Rr■■■■.

49. In one case the evidence shows the actual participation of Agron Krasniqi in the beating and torture of the victims.

49.1. On June 16, 1998, witness "U" was kidnapped by Agron Krasniqi and Z■■■■ B■■■■ and was taken to the village headquarters where he was interrogated by Selim Krasniqi. Selim Krasniqi had ordered Agron Krasniqi and Z■■■■ B■■■■ to beat the witness "U". The two then beat him up with a stick all over his body for about half an hour.

#### Statement of Selim Krasniqi

50. In his statement to the police, Selim Krasniqi said that he joined the KLA in early May of 1997. He was in Drenovc, Zatriq, from 28 April 1998 until June 1998, but his stay there was not continuous. At that time, Xh■■■■ G■■■■ "the German" was the commander of the KLA in Drenoc, Zatriq, while G■■■■ P■■■■ was the chief of the military police. Initially, the KLA headquarter in Drenovc was placed in a private house, but it was later transferred to the agricultural building situated outside the center of Drenovc. He denied any knowledge on the existence of a Detention Centre in Drenovc, but stated that there were some offices where certain people were held. These offices were in the building of a school, about 500 meters from the KLA headquarters. G■■■■ P■■■■'s office was in the same building. According to his statement, G■■■■ P■■■■ was the only person entitled to detain people in this building. Selim claims that G■■■■ P■■■■ had once told him that he (G■■■■) had brought in the building Kosovo Albanians suspected of being accomplices of the Serbian forces and some of them were caught red-handed.

51. Further, Selim Krasniqi stated that on three or four occasions when he went to the office of G■■■■ P■■■■, he saw G■■■■ interrogating some people. He did not know who was interrogated and had not noticed anything unusual on the way in which G■■■■ P■■■■ conducted interrogation.

52. Similarly, Selim Krasniqi declared that he was an ordinary soldier at the time he was in the village Drenovc in Zatriq without a specific duty or position. However, he admitted that he was

involved in disciplining soldiers and that the commander G [redacted] (Xh [redacted] G [redacted] – the German) was his superior.

53. When asked about the specific names of the victims mentioned above, Selim Krasniqi admitted he remembered the name of Sh [redacted] Sh [redacted] because G [redacted] P [redacted] had mentioned his name as an accomplice. He also told the police that a man with the surname P [redacted] was interrogated by G [redacted] P [redacted]. As for H [redacted] K [redacted] he remembered to have met him once outside the school courtyard, where G [redacted] P [redacted]'s office used to be. He believes that H [redacted] was interrogated by G [redacted] P [redacted], because that was the only reason why anyone would go to his office. Selim Krasniqi recalled the name of M [redacted] Rr [redacted]. He had heard that M [redacted]'s brother, H [redacted] Rr [redacted] was a Serb collaborator. Regarding other victims, namely H [redacted] T [redacted], A [redacted] B [redacted] and B [redacted] B [redacted], he denied having any knowledge or information about them.

54. Selim Krasniqi gave the same statement before the investigating judge and the court. In support of his assertion, Selim Krasniqi presented witnesses who testified that they had seen him in Tirana, Albania, somewhere in July and August 1998.

Statement of Bedri Zyberaj:

55. In his statement before the police investigators, Bedri Zyberaj claimed that he joined the KLA around March 1998, in order to help people. His main task was to assist in food distribution and dissemination of information. He claims that he has never worn a military uniform and held no specific rank. He admits that he has known Selim Krasniqi in June 1998, when the latter had started to work at the KLA headquarters in the village of Drenovc. Bedri Zyberaj admitted that he had heard of the existence of a detention center in Drenovc but it was dedicated for the soldiers of the KLA who misbehaved. However, he claimed that he never went out there and did not know the commander or the head of the detention center. During the criminal investigation and the main trial, he chose not to give a statement. Instead, he presented witnesses who testified about his character and stated that during the period in question Bedri Zyberaj was involved in charity work and management of a warehouse where the humanitarian aid for villagers was received, stored and distributed.

Statement of Islam Gashi

56. Islam Gashi testified before the investigating judge and the court that he joined the KLA on 26 April 1998. He was seriously wounded on May 27<sup>th</sup>, 1998, which sought to be hospitalized for more than one (1) month. Due to the nature of his injury, he could not return to the KLA until January 1999. He also declared that his father, I [redacted] G [redacted], was seriously injured on July 18<sup>th</sup>, 1998. Islam Gashi denied that the Drenovc village has had a KLA headquarter or detention center. Islam presented a number of witnesses who claimed that he was injured.

Statement of Agron Krasniqi

57. Agron Krasniqi told the judge that he had joined the KLA after his return to the village of Dej, on 21 June 1998. He denied knowing any of the other defendants or any connection to the KLA in the Drenovci village. He had not held any particular function and had never served out from his village. He presented a witness who confirmed that he had returned to his village from his studies in Pristina in June 1998, and had traveled to Albania in late June 1998, where he stayed until the end of July 1998.

## DESCRIPTION AND LEGAL NAMES OF THE CRIMINAL OFFENCES

(For the purposes of sections 305 (1) [3] and 305 (1) [4] PCPCK)

58. In the description of the criminal legal terms, any accusation of war crimes is preceded by a quotation from one or more specific crimes that can be included in it and that would constitute separate offenses under the Criminal Code of Kosovo in conjunction with the Criminal Code of Yugoslavia. It is also mentioned the corresponding article under the Provisional Criminal Code of Kosovo (KPCC) in order to enable the court to determine regarding the more favorable law.

### COUNT 1

59. At a date between 1 May 1998 and 31 August 1998, Selim Krasniqi in complicity with and assisted by other persons, acting in accordance with a common criminal plan to illegally detain Albanian civilians in Kosovo, has participated in the illegal arrest and detention of Kosovo Albanian civilians suspected of collaborating with the Serbs and has held these civilians in a location in the village of Drenovc, where they were detained and kept in inhumane conditions, without any opportunity for a fair trial and were subjected to beating and torture, thus exposing them to great suffering and violation of bodily health. Among the civilians illegally arrested, detained and beaten were: Sh■■■■ Sh■■■, B■■■ B■■■■, H■■■ P■■■, M■■■ Rr■■■■, H■■■ T■■■, A■■■ B■■■■, as well as witnesses, "A", "E", "U", "W" and "X".

60. By participating in the above-mentioned actions which amount to inhuman treatment of the Albanian citizens of Kosovo, Selim Krasniqi has assumed personal responsibility for the war crime of inhuman treatment and causing great suffering or serious injury to body or health of civilian detainees which is done through the application of measures of intimidation and terror, in violation of Article 142 of the Yugoslav Criminal Code in conjunction with Articles 22, 24, 26 and 30 of the Criminal Code of Yugoslavia (which corresponds to Article 118, paragraph 1 and paragraph 2, sub-paragraphs 2, 3, 6 and 7 of the Provisional Criminal Code of Kosovo - PCPCK in conjunction with Articles 120 paragraph 1 and 2, subparagraphs 1 and 2 of the PCCK in conjunction with Articles 23, 25, 26 and 31 of the PCCK).

### COUNT 2

61. At a date between 2 June 1998 and 31 August 1998, Bedri Zyberaj in complicity with and assisted by other persons, acting in accordance with a common criminal plan to illegally detain Kosovo Albanian civilians, has participated in the illegal arrest and detention of Kosovo Albanian civilians suspected of collaborating with the Serbs and has held these civilians in a location in the village of Drenovc, where they were detained and kept in inhumane conditions without any opportunity for a fair trial and were subjected to beating and torture, thus exposing them to great suffering and violation of bodily health. Among the civilians illegally arrested, detained and beaten were: Sh■■■■ Sh■■■, B■■■ B■■■■, H■■■ P■■■, M■■■ Rr■■■■, H■■■ T■■■, A■■■ B■■■■, as well as witnesses, "A", "E", "U", "W" and "X".

62. By participating in the above-mentioned actions which amount to inhuman treatment of the Albanian citizens of Kosovo, Bedri Zyberaj has assumed personal responsibility for the war crime of inhuman treatment and causing great suffering or serious injury to body or health of civilian detainees which is done through the application of measures of intimidation and terror, in violation of Article 142 of the Yugoslav Criminal Code in conjunction with Articles 22, 24, 26

and 30 of the Criminal Code of Yugoslavia (which corresponds to Article 118, paragraph 1 and paragraph 2 , sub-paragraphs 2, 3, 6 and 7 of the Provisional Criminal Code of Kosovo - PCPCK in conjunction with Articles 120 paragraph 1 and 2, subparagraphs 1 and 2 of the PCCK in conjunction with Articles 23, 25, 26 and 31 of the PCCK).

### COUNT 3

63. At a date between 2 June 1998 and 31 August 1998, Islam Gashi in complicity with and assisted by other persons, acting in accordance with a common criminal plan to illegally detain Albanian civilians in Kosovo, participated in the illegal arrest and detention of Kosovo Albanian civilians suspected of collaborating with the Serbs and has held these civilians in a location in the village of Drenovc, where they were detained and kept in inhumane conditions without any opportunity for a fair trial and were subjected to beating and torture, thus exposing them to great suffering and violation of bodily health. Among the civilians illegally arrested, detained and beaten were: Sh■■■■ Sh■■■, B■■■ B■■■■, H■■■ P■■■, M■■■ Rr■■■■, H■■■ T■■■■, A■■■ B■■■■, as well as witnesses, "A", "E", "U", "W" and "X".

64. By participating in the above-mentioned actions which amount to inhuman treatment of the citizens of Kosovo Albanians, Islam Gashi has assumed personal responsibility for the war crime of inhuman treatment and causing great suffering or serious injury to body or health of civilian detainees which is done through the application of measures of intimidation and terror, in violation of Article 142 of the Yugoslav Criminal Code in conjunction with Articles 22, 24, 26 and 30 of the Criminal Code of Yugoslavia (which corresponds to Article 118, paragraph 1 and paragraph 2 , sub-paragraphs 2, 3, 6 and 7 of the Provisional Criminal Code of Kosovo - PCPCK in conjunction with Articles 120 paragraph 1 and 2, subparagraphs 1 and 2 of the PCCK in conjunction with Articles 23, 25, 26 and 31 of the PCCK).

### COUNT 4

65. At a date between 2 June 1998 and 31 August 1998, Agron Krasniqi in complicity with and assisted by other persons, acting in accordance with a common plan to illegally detain Albanian civilians in Kosovo, participated in the illegal arrest and detention of Kosovo Albanian civilians suspected of collaborating with the Serbs and has held these civilians in a location in the village of Drenovc, where they were detained and kept in inhuman conditions without any opportunity for a fair trial and were subjected to beating and torture, thus exposing them to great suffering and violation of bodily health. Among the civilians illegally arrested, detained and beaten were: Sh■■■■ Sh■■■, B■■■ B■■■■, H■■■ P■■■, M■■■ Rr■■■■, H■■■ T■■■■, A■■■ B■■■■, as well as witnesses, "A", "E", "U", "W" and "X".

66. By participating in the above actions which amount to inhuman treatment of the Albanian citizens of Kosovo, Agron Krasniqi has assumed personal responsibility for the war crime of inhuman treatment and causing great suffering or serious injury to body or health of civilian detainees which is done through the application of measures of intimidation and terror, in violation of Article 142 of the Yugoslav Criminal Code in conjunction with Articles 22, 24, 26 and 30 of the Criminal Code of Yugoslavia (which corresponds to Article 118, paragraph 1 and paragraph 2 , sub-paragraphs 2, 3, 6 and 7 of the Provisional Criminal Code of Kosovo - PCPCK in conjunction with Articles 120 paragraph 1 and 2, subparagraphs 1 and 2 of the PCCK in conjunction with Articles 23, 25, 26 and 31 of the PCCK).



## **REASONING**

67. Evidence gathered during the police investigation and judicial investigation support accusations that the co-defendants violated the law in the manner described above. Evidence collected to date does not support any legal defense against the charges.

68. The undersigned Prosecutor holds that the defenses made by the co-defendants in paragraphs 50 to 58, which are generally denials, cannot refute evidence and identification made by witnesses.

## **PROPOSAL FOR MAIN TRIAL**

(Under Article 305 (1) [6] PCPC)

International Public Prosecutor proposes that the main trial for this case **be** scheduled and held before this Court.

## **RECOMMENDATION REGARDING EVIDENCE AND WITNESSES**

International Prosecutor asks:

A. For these persons to be invited:

International Prosecutor of Prizren

The codefendants

Defense counsels for the co-defendants

And these witnesses:

1. Witness A c / o CCIU Investigator Amrendra Sengar
2. Witness B
3. Witness C
4. Witness E
5. Witness F
6. Witness H
7. Witness I
8. Witness K
9. Witness N

10. Witness O
11. Witness P
12. Witness U
13. Witness Ę
14. Witness X
15. Witness Z
16. Witness TT
17. R [REDACTED] B [REDACTED]
18. E [REDACTED] B [REDACTED]
19. S [REDACTED] K [REDACTED]
20. M [REDACTED] Sh [REDACTED]

B. The court to read and review the documents and evidence according to the list prepared by the panel during the main trial

D. The undersigned International Prosecutor reserves the right to propose other matters that it thinks appropriate during the main trial.

### **REQUEST FOR DETENTION ON REMAND**

(Under Article 281 of the PCPCK)

Pursuant to Article 281 of the PCPCK, detention on remand is requested for the defendants Selim Krasniqi, Bedri Zyberaj, Islam Gashi and Agron Krasniqi for the reasons set out in Article 281 (1), point 1, and Article 281 (1), point (2), paragraphs (i), (ii) and (iii) PCPCK.

With regard to Article 281 (1), point 1, pending the submission of evidence by the defense witnesses, the prosecution at present is of the opinion that there is a well-grounded suspicion that all the defendants have committed the offenses described in the indictment and this is demonstrated by the evidence gathered so far. All defendants are implicated in one or more offenses of which they are charged.

With regard to Article 281 (2) (i) of the PCPCK, the prosecution continues to ensure the panel that since the defendants are facing serious charges for which severe penalties are foreseen, they might try to flee the jurisdiction of the court, an action that can be facilitated by the fact that the defendants have a very good knowledge of the border zones which are easily passable and a comprehensive support to which they can hope. The risk of flight has been subject of review earlier in previous decisions of the panel and the Supreme Court and it is unnecessary to waste time with other arguments on this point.

With regard to Article 281 (2) (ii) of the PCPCK, although the prosecution and defense witnesses have been heard, the prosecution strongly suggests that witness protection is essential not only before and during the trial, but it is more than necessary to safeguard the lives and welfare of witnesses after they have provided their testimonies. The court plays a fundamental role in ensuring the continued protection of witnesses from threats and intimidation, not only before and during the trial, but also after their depositions and it has been expressly stated in the Supreme Court on several occasions that it is a continuing obligation that should be kept in mind from the beginning of the procedure until the announcement of the final judgment.

In the opinion of the signed prosecutor, there continuous to exist an imminent danger to the safety of those witnesses and / or to the members of their families; the danger will not diminish because the evidence has been already given, quite the opposite, the situation has worsened because they have testified, therefore the prosecution is of the opinion that provisions of Article 281 (2) (ii) of the KPCC should apply.

With regard to Article 281 (2) (iii) of the PCPCK, in the event that the defendants will be released still exists the possibility that they will try to discover the whereabouts of the witnesses who have testified seeking redress through the commission of similar acts to those related to acts of war crimes. For this reason, it is in the interests of victims and witnesses (and in order to minimize their anxiety), that the defendants remain in custody and, therefore, prosecution is of the opinion that provisions of Article 281 (2), (iii) of the PCPCK should apply.

In accordance with Article 281 of the PCPCK, the DETENTION OF THE DEFENDANTS is proposed for the following reasons:

International Public Prosecutor believes that other measures provided for in Article 268, paragraph 1, of the PCPC will be insufficient to ensure the presence of the defendants, to prevent repeat offenses and to ensure successful conduct of the procedure.

International Public Prosecutor therefore proposes that these four defendants remain in detention until the end of the criminal proceedings.

In the light of the above, it is clear for the prosecution that the actions of the co-defendants include all essentials of the criminal offenses they are charged with, so this indictment is justified, certified and supported by law.

Paul Flynn

International Prosecutor

Stamp

Signature

*Për FDH/HLC – Kosovë përktueu Ardian Dika*