

**UNITED
NATIONS**



International Residual Mechanism
for Criminal Tribunals

Case No: MICT-14-67-ES.2

Date: 29 September 2025

Original: English

THE PRESIDENT OF THE MECHANISM

Before: Judge Graciela Gatti Santana, President

Registrar: Mr. Abubacarr M. Tambaou

Date: 29 September 2025

PROSECUTOR

v.

NEBOJŠA PAVKOVIĆ

***PUBLIC
WITH PUBLIC ANNEX***

**REGISTRAR'S SUBMISSION IN RELATION TO THE
DECISION ON THE APPLICATION FOR EARLY RELEASE
OF NEBOJŠA PAVKOVIĆ**

Counsel for Mr. Nebojša Pavković:

Mr. Aleksandar Aleksić

Republic of Finland

1. Pursuant to Rule 31(B) of the Rules of Procedure and Evidence of the International Residual Mechanism for Criminal Tribunals (“Mechanism”), I respectfully file this submission in relation to the President’s “Decision on the Application for Early Release of Nebojša Pavković” of 26 September 2025 (“Decision”).¹
2. In the Decision, the President directed the Registrar to: (i) urgently liaise with the authorities of the Republic of Serbia (“Serbia”) to obtain and confidentially file Serbia’s confirmation that all conditions of the Conditional Early Release Agreement (“Agreement”) will be monitored and complied with; (ii) urgently liaise with the Finnish authorities to obtain the signed Agreement; (iii) provide the authorities of Serbia and the Office of the Prosecutor with this decision as soon as possible; (iv) in the event that Mr. Pavković agrees with and signs the Agreement, and Serbia submits the necessary confirmation, take all necessary measures in coordination with the Finnish authorities, to facilitate Mr. Pavković’s immediate and urgent transfer to Serbia; (v) should Mr. Pavković be transferred to Serbia, and following receipt of information from the Serbian authorities that Mr. Pavković has arrived at his place of residence, lift the confidential status of the Decision and publicly file the signed Agreement; and (vi) once Mr. Pavković is transferred to Serbia, ensure that the independent medical expert, who provided information on Mr. Pavković’s health condition (“IME”), organises a monthly consultation with Mr. Pavković, and subsequently file a confidential report of each such consultation on the judicial record in this case, containing updated information on Mr. Pavković’s health condition, including his prognosis and life expectancy.²
3. On 26 September 2025, the Registry transmitted the confidential version of the Decision to the authorities of the Republic of Finland and Serbia.
4. On 27 September 2025, Counsel for Nebojša Pavković submitted to the Registry the signed Agreement.
5. On 29 September 2025, the Serbian authorities informed the Registry that on 28 September 2025, Mr. Pavković arrived in the Republic of Serbia and was immediately transferred to a medical facility where he was hospitalised.³

¹ *Prosecutor v. Nebojša Pavković*, Case No. MICT-14-67-ES.2, Decision on the Application for Early Release of Nebojša Pavković, confidential, 26 September 2025.

² See Decision, pp. 3-4.

³ Note Verbale from the Embassy of the Republic of Serbia to the Mechanism, 29 September 2025 (“Note Verbale”). The Registry received the Note Verbale in BCS.

6. On 29 September 2025, the Registry recirculated as a public filing the confidential version of the Decision.
7. The signed Agreement is attached as a public Annex to this submission.⁴
8. The Registry remains available should the President require further information.

Respectfully submitted,



Abubacarr M. Tambadou
Registrar

Dated this 29th day of September 2025,
At The Hague,
The Netherlands.

⁴ See Annex. The signed Agreement is annexed to this Submission in both English and BCS.

PUBLIC

ANNEX



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ANNEX**CONDITIONAL EARLY RELEASE AGREEMENT**Name: NEBOJŠA PAVKOVIĆDate of Birth: 10.04.1946.

I, the undersigned, declare that:

1. I have received the authoritative English version of this document, as well as the official translation into Bosnian/Croatian/Serbian ("BCS"), and have been advised by my recognised counsel ("Counsel") with regard to its contents, including the individual conditions set forth herein.
2. I have read, understand, and agree to comply fully with all conditions of my early release, as set forth below.
3. I agree to comply fully with all of the following conditions:
 - A. I shall remain under the supervision of a monitoring authority designated by Serbia ("Monitoring Authority") during the remainder of my sentence (until 25 December 2027);
 - B. I shall comply with any requirement made of me by the Monitoring Authority;
 - C. I shall notify the Monitoring Authority of my address of residence in Serbia, as well as the address of any medical clinic where I will receive treatment;
 - D. I shall remain within the confines of my residence or the relevant medical clinic during the remainder of my sentence. My presence at any other location, apart from during transit between the above two as necessary, must be requested before the President and approved in advance. Should an advance request not be possible due to an emergency situation, notice must be given as soon as possible, but in any event within 24 hours, and the President may then take appropriate steps;
 - E. I shall be subject to surveillance undertaken by authorised officials of the Monitoring Authority throughout my presence in Serbia;
 - F. I shall surrender all my travel documents to the Monitoring Authority for the entire duration of my conditional release;
 - G. I shall submit to a monthly consultation with the independent medical expert in my case, who shall subsequently submit a report of such consultation for filing on the judicial record;
 - H. I shall surrender to the Serbian authorities with a view to being transferred to the custody of the Mechanism, should the President so order for any reason;
 - I. I shall have no contact whatsoever with or, directly or indirectly, try to harm, intimidate, or otherwise interfere with, victims or witnesses who testified in my case or other cases before the International Criminal Tribunal for the former Yugoslavia ("ICTY") or the



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Mechanism and/or members of their respective families, with the sole exception being contact with witnesses who testified in my own defence;

- J. I shall not interfere in any way with the proceedings of the Mechanism or the administration of justice;
 - K. I shall not violate any orders issued by the ICTY or the Mechanism, and shall not otherwise reveal the identities of witnesses or potential witnesses in any way;
 - L. I shall not discuss my case, including any aspect of the events in the former Yugoslavia that were the subject of my case, with the media, through social media, or with anyone other than my Counsel, unless this has been specifically authorised in advance by the President;
 - M. I shall not make any statement denying the crimes over which the ICTY had jurisdiction, and over which the Mechanism retains jurisdiction, that were committed during the conflict in the former Yugoslavia;
 - N. I shall under no circumstances, directly or indirectly, express publicly any agreement with, or otherwise contribute in any way to, the glorification of persons convicted by the ICTY or the Mechanism;
 - O. I shall conduct myself honourably and peacefully in the community in which I will reside, and shall not engage in meetings or associations intended to plan civil unrest or actively engage in any political activities except for voting;
 - P. I shall deposit any firearms and other weapons requiring a licence with the Serbian authorities, and shall not purchase, possess, use, or handle any firearms or other weapons requiring a license;
 - Q. I shall not commit any offence that is punishable by any term of imprisonment, nor shall I publicly or privately incite or promote such an offence;
 - R. I shall notify the Monitoring Authority of any arrest, summons, or questioning by a law enforcement officer; and
 - S. I shall make efforts to contribute to my rehabilitation and resocialisation.
4. I understand and agree that I shall be subject to the conditions stated herein, unless they are revoked or modified, until the completion of my sentence.
5. I understand and agree that any change in the foregoing conditions can only be authorised by the President.
6. I understand and agree that if I violate or otherwise fail to comply fully with any of the conditions set out in this agreement, then my early release may be revoked at the sole discretion of the President.
7. I understand and accept that Serbia is obligated to:



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- (a) designate the authorised official(s) into whose custody I shall be delivered;
- (b) notify, as soon as practicable, the Registrar of the name(s) of the designated official(s);
- (c) designate a Monitoring Authority to supervise my conditional release in Serbia;
- (d) ensure my personal security and safety while on conditional release in Serbia;
- (e) provide 24-hour surveillance of me throughout my conditional release in Serbia;
- (f) cover any expenses that may arise in connection with my conditional release in Serbia;
- (g) revoke any licenses for firearms or other weapons that I may possess and ensure that no new licences are issued to me until the expiration of my sentence;
- (h) report immediately to the Registrar any threats to the security of any person as a consequence of my conditional release in Serbia;
- (i) detain me immediately should I breach any conditions of this agreement, and report immediately such breach to the Mechanism;
- (j) transfer me immediately to the custody of the Mechanism following a request by the Mechanism to do so; and
- (k) submit to the Registrar every month and for filing on the judicial record, a written report concerning my adherence to the conditions of my release.

8. I understand that once I have signed the authoritative English version of this document, as well as the official BCS translation, the original signed document (in both languages) is to be provided to the Registry of the Mechanism, which will subsequently file it publicly on the judicial record in the case *Prosecutor v. Nebojša Pavković*, Case No. MICT-14-67-ES.2, and that until I have been transferred to my place of residence, this matter must remain confidential for reasons of security.

✓ Signature: NEBOJŠA PAVKOVIĆ
 Name: NEBOJŠA PAVKOVIĆ
 Date: 27.09.2025.

Witnessed by:

Signature: Lučana Jodpitić



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Name: TIJANA DOBRIĆDate: 27.09.2025.



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DODATAK**SPORAZUM O USLOVNOM PREVREMENOM PUŠTANJU NA SLOBODU**Ime i prezime: NEBOJŠA PAVKOVIĆDatum rođenja: 10.04.1946.

Ja, dole potpisani, izjavljujem sledeće:

1. Primio sam primerak ovog dokumenta u merodavnoj verziji na engleskom jeziku kao i njegov zvaničan prevod na bosanskom/hrvatskom/srpskom (dalje u tekstu: BHS) jeziku, a moj pravni zastupnik kog je priznao Mehanizam (dalje u tekstu: zastupnik) posavetovao me je u vezi sa sadržajem istog, uključujući pojedinačne uslove navedene niže u tekstu.
2. Pročitao sam i razumeo, te pristajem da u potpunosti ispunim sve uslove prevremenog puštanja na slobodu, navedene niže u tekstu.
3. Pristajem da u potpunosti ispunim sve uslove koji slede:
 - A. Ostaću pod nadzorom nadzorne vlasti koju odredi Srbija (dalje u tekstu: nadzorna vlast) tokom preostalog dela kazne (do 25. decembra 2027.);
 - B. Postupaću u skladu sa svim uslovima koje odredi nadzorna vlast;
 - C. Prijaviću nadzornoj vlasti svoju adresu prebivališta u Srbiji, kao i adresu zdravstvene ustanove u kojoj ću se lečiti;
 - D. Boraviću samo na adresi prebivališta ili u relevantnoj zdravstvenoj ustanovi tokom preostalog dela kazne. Za moje prisustvo na bilo kojoj drugoj lokaciji, osim u toku tranzita između ove dve gore navedene lokacije, mora se predsedniku Mehanizma podneti zahtev koji mora biti odobren unapred. Ako, zbog hitnosti situacije, nije moguće podneti zahtev unapred, obaveštenje se mora podneti što je pre moguće, ali svakako u roku od 24 sata, a predsednik tada može preduzeti odgovarajuće korake;
 - E. U toku celokupnog boravka u Srbiji, biću pod stalnim nadzorom ovlašćenih lica nadzorne vlasti;
 - F. Nadzornoj vlasti ću predati sve putne isprave za vreme trajanja celokupnog uslovnog puštanja na slobodu;
 - G. Pristajem da me svakog meseca pregleda nezavisni medicinski stručnjak imenovan u mom predmetu, koji će zatim podneti izveštaj o pregledu koji će se zavediti u spis predmeta;
 - H. Predaću se vlastima Srbije radi prebacivanja u nadležnost Mehanizma ako to iz bilo kog razloga naloži predsednik;
 - I. Neću stupati u bilo kakav kontakt, direktno ili indirektno, niti ću pokušati da povredim, zastrašim ili na drugi način uznemiravam ni žrtve, ni svedoke koji su svedočili u mom predmetu ili u drugim predmetima pred Međunarodnim krivičnim sudom za bivšu



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Jugoslaviju (dalje u tekstu: MKSJ) ili Mehanizmom, kao ni s članovima njihovih porodica, s isključivim izuzetkom kontakta sa svedocima koji su svedočili u moju odbranu;

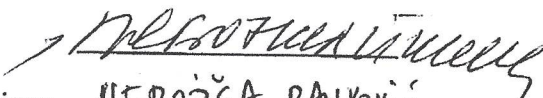
- J. Ni na koji način neću ometati postupke Mehanizma ni sprovođenje pravde;
 - K. Neću prekršiti nijedan nalog MKSJ ili Mehanizma i ni na koji način neću otkriti identitet svedoka ili potencijalnih svedoka;
 - L. Neću govoriti, putem medija, društvenih mreža, ili bilo s kim osim sa svojim zastupnikom, o svom predmetu, uključujući bilo koji aspekt događaja u bivšoj Jugoslaviji koji su bili predmet mog suđenja, sem ukoliko to konkretno nije unapred odobreno od strane predsednika;
 - M. Neću davati nikakve izjave kojima se negiraju zločini nad kojima je MKSJ imao nadležnost i nad kojima Mehanizam zadržava nadležnost, a koji su počinjeni tokom sukoba u bivšoj Jugoslaviji;
 - N. Ni pod kojim okolnostima neću, direktno ili indirektno, javno izraziti slaganje s licima koja su osudili MKSJ ili Mehanizam ili na bilo koji način doprineti njihovom veličanju;
 - O. U zajednici u kojoj boravim ponašaću se časno i miroljubivo i neću učestvovati u sastancima ili udruženjima namenjenim planiranju građanskih nereda niti aktivno učestvovati u bilo kakvim političkim aktivnostima, sem glasanja;
 - P. Sve vatreno i drugo oružje za koje je potrebna dozvola pohraniću kod vlasti Srbije i neću kupovati, posedovati, upotrebljavati niti rukovati bilo kakvim vatrenim ili drugim oružjem za koje je potrebna dozvola;
 - Q. Neću počiniti nijedno krivično delo koje je kažnjivo kaznom zatvora i suzdržaću se od javnog ili privatnog podsticanja ili promovisanja takvog krivičnog dela;
 - R. Nadzornu vlast ću obavestiti o eventualnim hapšenjima, pozivima ili ispitivanjima od strane službenika organa gonjenja; i
 - S. Ustrajaću u naporima da doprinesem svojoj rehabilitaciji i resocijalizaciji.
4. Shvatam i saglasan sam s tim da će se ovde navedeni uslovi odnositi na mene, sem ako ne budu poništeni ili izmenjeni, sve do isteka moje kazne.
 5. Shvatam i saglasan sam s tim da svaku izmenu gore navedenih uslova može da odobri isključivo predsednik.
 6. Shvatam i saglasan sam s tim da, ukoliko prekršim ili u potpunosti ne ispunim bilo koji od uslova navedenih u ovom sporazumu, predsednik može, isključivo na osnovu svog diskrecionog ovlašćenja, poništiti moje prevremeno puštanje na slobodu.
 7. Shvatam i prihvatam da je Srbija dužna:



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- (a) da odredi ovlašćena lica u čiju ću nadležnost biti predat;
- (b) da podnese sekretaru Mehanizma, što je pre izvodljivo, ime(na) ovlašćenih lica koja odredi;
- (c) da odredi nadzornu vlast koja će vršiti nadzor uslovnog puštanja na slobodu u Srbiji;
- (d) da obezbedi moju ličnu sigurnost i bezbednost za vreme uslovnog puštanja na slobodu u Srbiji;
- (e) da obezbedi 24-časovni nadzor za mene u toku uslovnog puštanja na slobodu u Srbiji;
- (f) da pokrije troškove koji mogu nastati u vezi s mojim uslovnim puštanjem na slobodu u Srbiji;
- (g) da poništi sve dozvole za vatreno ili drugo oružje koje eventualno imam i obezbedi da mi se do isteka kazne ne izdaju nove dozvole;
- (h) da bez odlaganja obavesti sekretara o eventualnim pretnjama za bezbednost bilo koje osobe koje nastupe kao posledica mog uslovnog puštanja na slobodu u Srbiji;
- (i) da me bez odlaganja uhapsi ako prekršim bilo koji od uslova ovog sporazuma, i da bez odlaganja obavesti Mehanizam o takvim kršenjima sporazuma;
- (j) da me bez odlaganja izruči u nadležnost Mehanizma ako Mehanizam to zatraži; i
- (k) da svakog meseca podnese sekretaru za spis predmeta pismeni izveštaj o mom pridržavanju uslova za puštanje na slobodu.

8. Shvatom da, čim potpišem i merodavnu verziju ovog dokumenta na engleskom jeziku i zvaničan prevod istog na BHS, originalni potpisani dokument (na oba jezika) se predaje Sekretarijatu Mehanizma, gde će naknadno biti javno zaveden u spis predmeta *Tužilac protiv Nebojše Pavkovića*, predmet br. MICT-14-67-ES.2, ali da sve do mog premeštaja na mesto prebivališta, ova stvar mora ostati poverljiva iz bezbednosnih razloga.

✓ Potpis: 
Ime i prezime: NEBOJŠA PAVKOVIĆ
Datum: 27.09.2025.



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Svedok:

Potpis:

tiyana Jodput

Ime i prezime:

tiyana DOBRIĆ

Datum:

27.09.2025,



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I - FILING INFORMATION / INFORMATIONS GÉNÉRALES

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From/ De :	☐ President/ Président	☐ Chambers/ Chambre	☐ Prosecution/ Bureau du Procureur	☐ Defence/ Défense
			☒ Registrar/ Greffier	☐ Other/ Autre
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	☐ Confidential/ Confidential	☐ Ex Parte Prosecution excluded/ Bureau du Procureur exclu		
		☐ Ex Parte Rule 86 applicant excluded/ Article 86 requérant exclu		
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Document type/ Type de document :	☐ Motion/ Requête ☐ Judgement/ Jugement/Arrêt ☐ Book of Authorities/ Recueil de sources ☐ Warrant/ Mandat ☐ Decision/ Décision ☐ Submission from parties/ Écritures déposées par des parties ☐ Affidavit/ Déclaration sous serment ☐ Notice of Appeal/ Acte d'appel ☐ Order/ Ordonnance ☒ Submission from non-parties/ Écritures déposées par des tiers ☐ Indictment/ Acte d'accusation			

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