

THE INTERNATIONAL CRIMINAL TRIBUNAL  
FOR THE FORMER YUGOSLAVIA

CASE No. IT-95-5/18-T

IN TRIAL CHAMBER No. 3

Before: Judge O-Gon Kwon, Presiding  
Judge Howard Morrison  
Judge Melville Baird  
Judge Flavia Lattanzi, Reserve Judge

Registrar: Mr. John Hocking

Date: 29 November 2010

THE PROSECUTOR

v.

RADOVAN KARADZIC

*Public*

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LETTER TO BOSNIA

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The Office of the Prosecutor:

Embassy of Bosnia and Herzegovina

Mr. Alan Tieger  
Ms. Hildegard Uertz-Retzlaff

The Accused:  
Radovan Karadzic

Dr. Radovan Karadzic  
International Criminal Tribunal for the former Yugoslavia  
The Hague, Netherlands

29 November 2010

The Honorable Miranda Sidran-Kamišalić  
Ambassador  
Embassy of Government of Bosnia and Herzegovina  
Bezuidenhoutseweg 223  
2495 AL The Hague

Dear Ms. Ambassador,

Thank you for the documents submitted by the government of Bosnia on 15 November 2010 in response to my requests. I appreciate the effort that the government of Bosnia has made to produce the material I need for my defence.

However, the documents produced by the government of Bosnia do not appear to be responsive to my requests.

For example, I requested

- (1) All minutes, notes, reports, or memoranda of any meeting between a representative of the government of Bosnia and Herzegovina and any representative of the governments of the United States or Turkey, or private individuals or organizations from the United States at which shipments of arms, ammunition, or military equipment that were delivered to Tuzla was discussed during the period 1 January 1995 through 31 March 1995.

The government of Bosnia produced 13 documents related to this item, but not a single one of them related to "shipments of arms, ammunition, or military equipment that were delivered to Tuzla". They were all documents related to political lobbying by Bosnia to lift the arms embargo or records of visits by American and Turkish delegations.

With respect to my requests:

- (2) All reports, photographs, or records of cargo delivered to Tuzla by C-130 transport during February and March 1995.
- (4) All contracts, agreements, or reports or memoranda reflecting agreements for the purchase of arms, ammunition, or military equipment by the government of Bosnia and Herzegovina or any individuals affiliated with the government of Bosnia and Herzegovina which were delivered, in

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whole or in part, in Tuzla by C-130 transport during February and March 1995

- (5) All instructions, orders, and requests issued by the Army of Bosnia and Herzegovina concerning the delivery, unloading, distribution or protection of arms, ammunition, or military equipment arriving in Tuzla by air during February and March 1995.
- (6) All notes, reports, or recordings of intercepted conversations between 10 February 1995 and 31 March 1995 in which the delivery of arms, ammunition, or military equipment arriving in Tuzla by air was discussed.

no responsive documents were produced.

Therefore, the documents produced by the government of Bosnia shed no light on where it got the arms, ammunition, or military equipment that was clandestinely delivered to the Tuzla Air Strip in February and March 1995.

In order to move this process forward, I hereby request that the government of Bosnia authorize and facilitate an interview by my Legal Advisor Peter Robinson with General **Sead Delic**, who was the commander of the ABiH 2<sup>nd</sup> Corps in Tuzla in February 1995, and Brigadier **Refik Brdjanovic**, former commander of the Black Wolves Special Forces Unit, who has acknowledged to BBC News that he was involved in receiving the shipments.

It is hoped that by interviewing these two men, my defence team can obtain additional information about these shipments and about the existence and location of documents in the possession of your government pertaining to these shipments.

I would appreciate it if you could advise me by 15 December 2010 if the government of Bosnia is willing to voluntarily facilitate such interviews, or whether I should seek subpoenas from the Trial Chamber to compel the individuals to submit to an interview.

With respect to my requests concerning material related to the organization "Seve" and crimes committed by Herendia, Ugljen, and Garaplija, I note that the government of Bosnia has not produced any relevant material. I will therefore be filing a motion for a binding order with respect to these items.

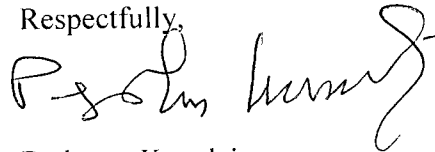
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With respect to my requests for death certificates and certificates of missing persons, I note that your submission includes a letter from the Sarajevo court authorities indicating that it will take more time to produce these documents. I appreciate the effort that is being made and I will await the production of these documents from your government in the near future.

Please feel free to contact my Legal Advisor Peter Robinson at [peter@peterrobinson.com](mailto:peter@peterrobinson.com) if we can be of any assistance to you or if you have any questions about my requests.

Thank you again for your cooperation.

Respectfully,

A handwritten signature in black ink, appearing to read 'Radovan Karadzic', written in a cursive style.

Radovan Karadzic