



CASA Legal & Policy Desk

Legal Analysis

PROCEDURAL LEGALITY OF THE DEMOLITION OF HOUSES AND HOLIDAY HOMES IN THE LAKE GAZIVODE AREA

in Light of the Applicable Law of Kosovo, the
Constitution of Kosovo, and the Case-Law of the
European Court of Human Rights

September, 2026
North Mitrovica



Legal Analysis

PROCEDURAL LEGALITY OF THE DEMOLITION OF HOUSES AND HOLIDAY HOMES IN THE AREA OF LAKE GAZIVODE

*In Light of the Applicable Law of Kosovo, the Constitution of Kosovo, and the
Case-Law of the European Court of Human Rights*

CASA Legal & Policy Desk

Prepared by: Ivan Spasojević

Edited by: Tijana Grujić

**September 2026
NGO CASA**

Content

Introduction, Scope, Sources and Limitations of the Analysis	3
I Factual and Institutional Framework	5
1. Establishment and Original Purpose of the Gazivode/Ibar-Lepenac System.....	5
2. Legal Status of the “Ibar-Lepenac” Company	5
3. Content of the Notice of 3 July 2026.....	6
4. Demolition and the Role of the Police According to Publicly Available Information	7
II Procedural Violations in the Conduct of the Company and Public Authorities.....	8
1. A Dispute over the Lawfulness of Demolition Is Not the Same as a Dispute over Ownership.....	8
2. Lack of Authority of the “Ibar-Lepenac” Company to Carry Out Administrative Demolition.....	9
3. Mandatory Procedural Steps and Potential Irregularities in the Procedure	10
4. Violations of the Law on General Administrative Procedure	11
5. Inspection, Construction and Water Regime.....	13
6. Unlawfulness of Police Assistance	14
7. Violations of the Provisions of the Constitution of Kosovo	15
8. Violations of Other Domestic Legislation.....	16
III The Event Viewed Through the Lens of Article 1 of Protocol No. 1 to the European Convention on Human Rights and the Case-Law of the Strasbourg Court	16
1. Manner of Application in Kosovo	16
2. Whether the Owners Have “Possessions” Within the Meaning of the ECHR	17
3. The Three Rules of Article 1 of Protocol No. 1.....	17
4. Examples from the Case-Law of the Strasbourg Court.....	18
5. Article 8 and the Concept of “Home”	20
IV MAIN CONCLUSIONS.....	21
Annex: Delivered Notice of “Ibar-Lepenac” dated 3 July 2026	22

Introduction, Scope, Sources and Limitations of the Analysis

The subject matter of this analysis is neither an examination of ownership rights over the land surrounding Lake Gazivode nor a general defence of “illegal” construction. Its scope is narrower, but equally important from the perspective of legality: **whether the demolition of private houses and holiday homes at Lake Gazivode between the end of June and the end of July 2026 was carried out by the competent authority, on the basis of an individualized, reasoned, and enforceable act, following proper notification of the owners or users, and with an effective opportunity for judicial review before an irreversible consequence occurred (the demolition of the houses or holiday homes).** In other words, the question is whether the procedure prescribed by law was followed in this case and whether the competent institutions acted within the law or exceeded their statutory powers. The principle of legality requires every authority to act only within the scope of the powers conferred upon it by law.

During period June – July 2026, the private structures at Lake Gazivode were demolished on several occasions:

In April 2026, “Ibar-Lepenac” sent the owners of five holiday homes in Ččevo, at Lake Gazivode, a **request to vacate the premises**. The notice stated that the structures were located on parcels that the company considered to be its property. Demolition began on **26 June 2026**.¹

On 3 July 2026, “Ibar-Lepenac” left a **“request for the immediate vacating of occupied property”** on the doors of 11 private houses and holiday homes, as discovered by their owners.² The deadline for vacating the structures was 15 days. The demolition of these holiday homes began on 21 July,³ and was completed with the demolition of the “Jezero” motel on 30 July 2026.⁴

The subject of this analysis is this latter case, namely the notice dated 3 July 2026 that the company left on the doors of the structures subsequently demolished, and which is, to date, the only known document on the basis of which the demolitions were carried out. Based on this notice and publicly available information, the preliminary conclusion is that, by its legal nature and content alone, it does not constitute a decision issued by a construction or other competent inspector, a judicial decision, or an enforceable instrument. Rather, it is a demand by a company asserting ownership rights that the users voluntarily vacate the parcel and remove the structures. “Ibar-Lepenac” is a central public enterprise organized as a joint-stock company.

¹ Radio Kontakt Plus, “Demolition of holiday homes begins in Ččevo near Zubin Potok.”

<https://radiokontaktplus.org/vesti/pocelo-rusenje-vikendica-u-cecevu-kod-zubinog-potoka/133557/>

² KoSsev, “Ibar-Lepenac leaves requests for the eviction of another 11 holiday homes at Gazivode; owners: no demolition without a court decision.” <https://kossev.info/en/ibar-lepenac-ostavio-zahteve-za-iseljenje-jos-11-vikendica-na-gazivodama-vlasnici-bez-sudske-odluke-nema-rusenja/>

³ Euronews Serbia, report on the demolition of holiday homes owned by Serbs at Lake Gazivode.

<https://www.euronews.rs/srbija/politika/233816/rusenje-vikendica-u-vlasnistvu-srba-na-jezeru-gazivode/vest>

⁴ Radio Free Europe, report on the demolition of the “Jezero” motel.

<https://www.slobodnaevropa.org/a/kosovo-rusenje-kuce-jezero-gazivode/33818326.html> Nova.rs, report on the earlier demolition at the Rezala camp. <https://nova.rs/vesti/drustvo/pocelo-rusenje-vikendica-na-gazivodama-kosovska-policija-asistira-preduzecu-ibar-lepenac-foto/>

This status confers property and management rights upon it, as well as an obligation to protect its assets, but does not, in itself, confer administrative, judicial, inspection, police, or enforcement powers.

The demolition could have been lawful only if, independently of the company's notice, the competent inspectorate had conducted the prescribed procedure, established its subject-matter and territorial jurisdiction, identified each parcel, structure, and responsible person, provided an opportunity to make representations and inspect the file, established the ownership status, planning and water-law regime, and the status of any pending legalization applications, issued an individualized and reasoned decision, duly served it together with information on the available legal remedy, established its enforceability, and only then requested police assistance in the prescribed form, in accordance with the administrative instruction governing police action upon requests from public authorities. If any of these links in the procedural chain is missing, this would constitute a serious procedural unlawfulness.

This conclusion is reinforced by the constitutional guarantees of property, fair proceedings, and an effective legal remedy, as well as by the standards developed by the European Court of Human Rights. Their purpose is not to render unlawful construction lawful merely through the passage of time, but to recognize that the physical destruction of a structure constitutes an irreversible measure requiring particularly strong procedural safeguards before, rather than only after, enforcement.

The analysis is based on: (1) the notice issued by "Ibar-Lepenac" on 3 July 2026; (2) public statements by the company, the police, owners, and local representatives; (3) media reports and statements by international missions; (4) the applicable Kosovo legislation available in the official legal database; and (5) the European Court of Human Rights' Guide and case-law concerning Article 1 of Protocol No. 1 to the European Convention on Human Rights.

For the purposes of a final legal opinion, the most important primary records are still unavailable: cadastral extracts and parcel histories, expropriation acts, contracts relied upon by the users, and, above all, inspection records, individual demolition decisions, proof of service, confirmations of enforceability, decisions on appeals, legalization applications, the request for police assistance, the risk assessment and operational order, as well as court decisions concerning interim measures. Accordingly, conclusions concerning specific violations are formulated conditionally: **if the authorities are unable to produce the above-mentioned acts, there are strong grounds for considering the demolitions procedurally unlawful and arbitrary.**

Public statements are not entirely consistent. In an earlier incident, a police representative described the demolition as an action carried out by the company with police assistance, whereas in subsequent statements the company's director stated that the company does not make demolition decisions but reports irregularities, while the demolition was allegedly ordered by the inspectorate of the relevant ministry.⁵ This inconsistency further underscores the need to establish who was the decision-maker, who was formally responsible for enforcement, and who merely provided technical or security support.

⁵ Radio Free Europe, "Kosovo demolishes structures at Gazivode, owners say court dispute is ongoing"; Nova.rs, report on the earlier demolition at the Rezala camp. <https://www.slobodnaevropa.org/a/kosovo-gazivode-rusenje-vikendice/33809151.html>

I Factual and Institutional Framework

1. Establishment and Original Purpose of the Gazivode/Ibar-Lepenac System

Lake Gazivode was not created as a project of Kosovo's contemporary institutions. It forms part of the Ibar–Lepenac multipurpose system, conceived and constructed during the period of the Socialist Federal Republic of Yugoslavia and the then Socialist Autonomous Province of Kosovo. The International Bank for Reconstruction and Development approved a loan for the first phase of the project in 1971; the borrower was the SFRY, and the project covered water supply for industry and the population, irrigation, drainage, and electricity generation.⁶

Construction of the system took place predominantly during the 1970s. The Gazivode Dam, a rock-fill dam on the Ibar River upstream from Mitrovica, became operational in 1979, while the wider water management system was completed and further developed in the early 1980s. The reservoir serves multiple purposes and is of strategic importance for water management, energy, and the economy.⁷

These historical facts are important for two reasons. First, they demonstrate that the legal regime governing land, expropriation, and rights of use may have developed across several different legal periods. Second, the current registration of a legal entity in the cadastre does not, in itself, resolve all questions concerning previous rights of use, the validity of agreements, the scope of expropriation, or the good faith of possessors. Such questions require an examination of the complete legal chain, rather than reliance on a single current extract.

2. Legal Status of the “Ibar-Lepenac” Company

Under Law No. 03/L-087 on Publicly Owned Enterprises, “Ibar Lepenac DD” is listed in Annex 1 as a central publicly owned enterprise. Central publicly owned enterprises are owned by Kosovo, while the Government exercises the shareholder rights. At the same time, the law provides that every publicly owned enterprise is organized as a joint-stock company in accordance with the rules of company law.⁸

This dual characteristic must be properly understood:

⁶ World Bank, *Appraisal of the Ibar Multipurpose Water Project*, 1971 <https://documents1.worldbank.org/curated/en/719491468135018248/pdf/multi-page.pdf>; UN Treaty Series, Loan Agreement of 30 June 1971.

https://upload.wikimedia.org/wikipedia/commons/0/05/UN_Treaty_Series_-_vol_838.pdf

⁷ World Bank, *Environmental and Social Management Framework* — description of the Gazivode Dam and Reservoir https://ewdata.rightsindevelopment.org/files/documents/29/WB-P133829_mwUL7AP.pdf. Ibar–Lepenac/World Bank, description of the system and construction period. https://www.iber-lepenc.org/wp-content/uploads/2023/03/03-REol-Kosovo-TA_01-Mart-2023_ser.docx.pdf

⁸ Law No. 03/L-087 on Publicly Owned Enterprises, particularly Articles 2–5 and Annex 1, paragraph 7. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2547&langid=2>

Question	Legal answer
Who owns the shares?	Kosovo; the Government exercises the shareholder rights.
What is the organizational form?	A joint-stock company, i.e. a separate legal entity.
Is it a private company?	Not in terms of ownership; it is a central publicly owned enterprise.
Does public ownership automatically confer administrative authority?	No. Administrative and coercive powers must be expressly conferred by law.
What can the company do as the titleholder or manager of property?	Manage, maintain, and protect the property; issue warnings, report irregularities, and use civil-law and other procedures provided by law.
What can it not do solely on the basis of its ownership status?	Act as a construction or other inspector, issue an administrative demolition order, decide on an appeal, order the police to act, or unilaterally carry out the disputed measure.

The Law on Publicly Owned Enterprises itself distinguishes between a “public authority,” which exercises executive, regulatory, or administrative authority on the basis of constitutional or statutory powers, and a publicly owned enterprise as a commercial company. Therefore, it is not sufficient to state that the company is “public”; the specific statutory provision conferring authority to issue and enforce a demolition order must be identified. No such general authority of “Ibar–Lepenac” has been established in the applicable legislation.

Law No. 08/L-125 on Public Property requires institutions and entities using public property to safeguard and maintain it. At the same time, it is based on the principles of legality, transparency, predictability, and accountability and requires powers to be exercised in accordance with the Constitution, the law, and the rules of general administrative procedure.⁹ The obligation to protect property, therefore, is not the same as the authority to exercise direct coercion. The owner of public property may request a protective measure restricting the rights of others, but such a measure must be issued and enforced by the competent authority in accordance with the prescribed procedure.

3. Content of the Notice of 3 July 2026

The notice is addressed to the “occupiers of the property” and bears the subject line “Request for the Urgent Vacating of the Occupied Property.” It is signed by the General Director of “Ibar–Lepenac.” In the notice, the company claims to be the legal owner of the designated parcel in the Velji Breg cadastral zone, states that the villas were constructed without a permit and without the owner’s consent, and sets a deadline of 15 days from receipt or posting of the notice for the parcel to be vacated, the belongings and structures removed, and the land restored to its previous condition. The notice announces that “all legal actions” will be taken, while

⁹ Law No. 08/L-125 on Public Property, particularly Articles 3–5 and 24–25. <https://md.rks-gov.net/wp-content/uploads/2024/07/E9D5FA7B-4F87-4FC3-873E-15999A85035C.pdf>

stating that the police and the Inspectorate of the Municipality of Zubin Potok have been informed and requested to act within their respective competences.

In terms of its form and content, the document has the character of an **extrajudicial demand by an alleged owner**. It does not contain:

- the title of the administrative matter and the identification number of an inspection case;
- the name and authorization of the inspector who conducted the proceedings;
- the statutory provision conferring authority to order demolition;
- established facts concerning each individual structure;
- the operative part of an administrative decision specifying the obligation and the manner of its enforcement;
- instructions on the right to appeal, the applicable time limit, and the authority to which the appeal should be submitted;
- instructions on judicial protection;
- confirmation that the decision is final or enforceable;
- a decision ordering compulsory enforcement.

Nor does the statement that the notice is deemed to have been served by posting it on the property transform a private or corporate demand into a properly served administrative decision. Service of an individual administrative act is regulated by law and cannot be altered unilaterally by a commercial company.

4. Demolition and the Role of the Police According to Publicly Available Information

According to reports by Radio Free Europe, on 21 July 2026, approximately eleven structures in the vicinity of the lake were demolished by excavators in the presence of police officers. The owners stated that they had initiated court proceedings and relied on long-term rights of use, while the company's director stated that the demolition decisions were not issued by "Ibar-Lepenac," but that the demolitions had been ordered by the Inspectorate of the Ministry of Environment, Spatial Planning and Infrastructure.¹⁰ In a subsequent wave of demolitions, a police official stated that the police had provided support to the company and the Inspectorate in enforcing the decision.¹¹

Some users claim that they had used the structures for many years, had electricity bills, had submitted applications for legalization, or based their use on agreements with "Srbijašume." One user stated that they had occupied the structure from March to November, while another public report described a family with three minor children who were given approximately thirty minutes to leave the property.¹² These claims do not establish ownership or the legality of the

¹⁰ Radio Free Europe, 21 July 2026. <https://www.slobodnaevropa.org/a/kosovo-gazivode-rusenje-vikendice/33809151.html>

¹¹ Radio Free Europe, "Demolition of Houses Near Lake Gazivode Continues." <https://www.slobodnaevropa.org/a/kosovo-rusenje-kuce-jezero-gazivode/33818326.html>

¹² *Vreme*, field report <https://vreme.com/vesti/pocelo-rusenje-vikendica-kod-gazivoda-vlasnicima-dali-30-minuta-da-napuste-objekte/> Kosovo Online, public forum of property owners and the company. <https://www.kosovo-online.com/en/news/society/cottage-owners-lake-gazivode-seek-solution-ibar-lepenac-defends-its-position-14-7-2026>

construction, but they are procedurally relevant because the competent authority was required to examine them and individualize the measure.

The European Union Office in Kosovo expressed regret that the demolitions took place even though, according to its information, the affected residents had initiated court proceedings within the deadline provided. The EU emphasized the lack of a prescribed procedure, the need for effective legal remedies, and that the role of the police must remain within the scope of a clear request and decision by the competent authority, with proper documentation. The OSCE likewise stressed that measures affecting property must strictly comply with the legal framework and that affected persons must be provided, in a timely manner, with the legal basis for the decision.¹³

II Procedural Violations in the Conduct of the Company and Public Authorities

1. A Dispute over the Lawfulness of Demolition Is Not the Same as a Dispute over Ownership

Even if it were accepted that “Ibar–Lepenac” is the registered owner of the land and that the structures do not have building permits, it does not follow that demolition without the prescribed procedure is lawful. Three distinct questions must be separated:

1. **Ownership and possession:**
Who owns the parcel, and is there a right of use, lease, right to build, or another legal basis for possession?
2. **Construction and public-law status:**
Do the structure have a permit, can it be legalized, is it located within a protected or water protection zone, and which inspector has jurisdiction?
3. **Enforcement:**
Is there a specific, duly served, and enforceable decision, and who is authorized to enforce it coercively?

These questions may be interconnected, but one does not replace another. The company’s registration in the cadastre does not constitute a demolition decision. A cadastral registration may be strong evidence of ownership of the parcel, but it does not, in itself, constitute an administrative demolition decision or replace the procedure for determining the conditions and manner of removal of a structure. The absence of a building permit does not establish enforceability. The presence of the police does not constitute a legal basis.

¹³ European Western Balkans, overview of the reactions of the EU, OSCE, Germany, and the United Kingdom; <https://europeanwesternbalkans.com/2026/07/23/international-missions-condemn-the-demolition-of-serb-owned-villas-near-lake-gazivode-in-northern-kosovo/> EU Office in Kosovo, public statement. <https://www.facebook.com/EuropeanUnionInKosovo/posts/the-eu-in-kosovo-regrets-yesterdays-demolition-of-houses-at-gazivodeujman-lake-w/1501373552029453/>

2. Lack of Authority of the “Ibar-Lepenac” Company to Carry Out Administrative Demolition

The principle of legality requires every authority to act only within the powers conferred upon it by law. As an alleged owner, the company may:

- issue a warning and request voluntary vacating of the property;
- report unauthorized construction to the competent inspection authority;
- bring an action concerning ownership or possession and request an interim measure;
- seek compensation for damages or another form of legal protection;
- submit documentation in administrative proceedings conducted by the competent authority.

However, the ownership powers set out in Article 18 of Law No. 03/L-154 on Property and Other Real Rights must be exercised within the limits established by law and the rights of third parties. The same law expressly provides that ownership and other real rights may be restricted or expropriated against the will of the holder only under the conditions and through the procedure prescribed by law.¹⁴ The law provides the owner with judicial claims for the restitution of property and cessation of interference with ownership or possession; it does not establish a general right to carry out planned self-help demolition of an immovable structure following a company-issued ultimatum.

In the present case, this is not a matter of immediately repelling an ongoing interference with possession, but of a planned operation carried out after the expiry of a 15-day deadline, involving heavy machinery and police. This is a typical situation in which an institutional, rather than a self-help, legal avenue must be used.

Specific legislation entrusts construction, spatial planning, water and environmental inspections to authorized inspectors at the central or local level, depending on the category of the structure and the subject matter concerned. Law No. 04/L-110 on Construction regulates permits and construction supervision, while Law No. 04/L-175 regulates the Inspectorate for Environment, Waters, Nature, Spatial Planning and Construction. The general procedural framework for inspections is established by Law No. 08/L-067 on Inspections.¹⁵ None of these laws permits a publicly owned enterprise to assume the role of an inspector.

If the demolition was indeed ordered by a Ministry inspectorate, the competent authority must produce that specific act and the complete administrative file. If such an act exists but was adopted only after the decision to demolish had, in practice, already been made and implemented by other actors, the question arises as to whether the act constituted the actual legal basis for the measure or merely provided ex post facto formal justification for an action that had already been taken. This is a matter that requires access to the administrative file. If

¹⁴ Law No. 03/L-154 on Property and Other Real Rights, Article 1(4) and Article 18, as well as the provisions on judicial protection of ownership and possession. <https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=2643>

¹⁵ Law No. 04/L-110 on Construction <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2833&langid=2> Law No. 08/L-067 on Inspections <https://gzk.rks-gov.net/ActDetail.aspx?ActID=53067&langid=2> Law No. 04/L-175 on the Inspectorate of Environment, Waters, Nature, Spatial Planning and Construction https://cps.rks-gov.net/wp-content/uploads/2020/09/LAW_No._04_L-175_ON_THE_INSPECTORATE_OF_ENVIRONMENT_WATERS_NATURE_SPATIAL_PLANNING_AND_CONSTRUCTI ON.pdf Law No. 04/L-147 on the Waters of Kosovo.

the act exists but was not served on the affected persons, they nevertheless were not afforded a genuine opportunity to challenge it.

3. Mandatory Procedural Steps and Potential Irregularities in the Procedure

Stage	What Should Have Existed	What Is Currently Apparent from the Available Material
Initiation	A complaint by the company or an ex officio inspection procedure, with a clearly defined subject matter and jurisdiction	There is a company request addressed to the “occupiers”; the inspection case file has not been provided.
Inspection	Authorization of the inspector, an inspection record, identification of the parcel and each structure, photographs, and established facts	No evidence has been presented that an inspection was carried out.
Participation of the Party	Notification of the proceedings, an opportunity to make representations, and access to the case file and evidence	The letter uses the term “occupiers” in advance; there is no evidence that the affected persons were heard.
Preliminary Issues	Verification of cadastral records, expropriation, agreements, rights of use, legalization, and the jurisdiction of the central/local authority	There are public allegations concerning disputes and claims, but no reasoned response from the authorities has been presented.
Decision	An individual, written and reasoned decision of the competent authority, with a clear operative part	Only the company’s notice has been presented.
Service	Proper service of the decision on each known person, or legally valid substitute service	The company claims that its letter was served by posting it on the property. This does not establish service of an inspection decision and is clearly inconsistent with the rules governing personal service.
Legal Remedy	Instructions on legal remedies, a reasonable time limit, and the possibility of appeal and/or a request for suspension/judicial protection	The notice contains no instructions on legal remedies. It has been publicly stated that some proceedings were already pending.

Stage	What Should Have Existed	What Is Currently Apparent from the Available Material
Enforceability	Proof of finality/enforceability or a specifically reasoned legal basis for earlier enforcement	No such documentation has been presented.
Enforcement	An enforcement order, identification of the person carrying out the enforcement, a safety plan, a deadline for removing belongings, a record, and an inventory of damage	Public reports refer to a very short period allowed for vacating the premises; the complete documentation is not available.
Police Assistance	A written request from the competent authority, confirmation that the authority had previously fulfilled its obligations, a risk assessment, and a police decision	No such documentation has been presented; public statements are inconsistent as to who requested and led the operation.

This sequence is not a mere formality. It separates the rule of law and the legal order from the use of physical force. The principle of legality must protect public authorities from arbitrary action by individuals, but equally protect individuals from arbitrary action by public authorities.

4. Violations of the Law on General Administrative Procedure

Law No. 05/L-031 on General Administrative Procedure requires public authorities to act lawfully and proportionately, to respect legitimate and reasonable expectations, and to ensure access to legal remedies. A written administrative act must contain the competent authority, the legal basis, the operative part, a clear and complete statement of the relevant facts and legal reasons, as well as instructions on the available legal remedy.¹⁶

In relation to the demolition, the potential violations are as follows:

4.1 Lack of Competence of the Decision-Maker

If the only document presented is the company's letter, the decision was not issued by an authority authorized to impose an inspection measure. The Law on Inspection clearly prescribes the procedure for conducting inspections, the powers of inspectors, the conditions

¹⁶ Law No. 05/L-031 on General Administrative Procedure, in particular the principles of legality, proportionality, legitimate expectations, the right to a legal remedy, and the rules concerning the content and reasoning of administrative acts. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=12559&langid=2>

that must be met for an inspection to be lawful, as well as the initiation of disciplinary proceedings where inspection activities are carried out contrary to the applicable regulations.

4.2 Lack of Individualization

A collective communication addressed to “occupiers” does not replace the determination of the identity and legal status of each individual. The structures may differ in age, purpose, documentation, and legalization status. Some may be occasional holiday homes, while others may constitute actual homes. Legality requires a decision based on the facts of each individual case.

4.3 Predetermined Conclusion and Violation of the Principle of *Audi Alteram Partem* Before the Competent Administrative Authority

Referring to all users as “occupiers” before the proceedings have been conducted suggests that ownership, the legal basis for possession, and good faith have already been determined. If the parties were not given an opportunity to submit contracts, bills, permits, legalization applications, and evidence concerning the duration of their use to the competent administrative or judicial authority, the proceedings did not provide a genuine opportunity to be heard.

4.4 Lack of Reasons

The assertion that the company is the owner and that the structures lack permits is not sufficient. The competent authority was required to explain which regulation had been violated, who the investor or responsible person was, what category each structure belonged to, why that particular authority had jurisdiction, what water and spatial-planning regime applied, why legalization was not possible or did not suspend enforcement, why demolition was necessary rather than a less intrusive measure, and when the decision became enforceable.

4.5 Improper Service

Posting the company’s letter on a structure may establish that the owner issued a warning. It does not establish that the party was served with a decision of an administrative authority. Where the identity or address of the user was known or could reasonably have been established, particularly where they had submitted applications or paid for services, the authority was required to apply the rules governing official service.

4.6 Ineffective Legal Remedy

A legal remedy against demolition must be effective. Compensation for damages years later cannot fully restore a demolished structure, belongings, or a home. Law No. 08/L-182 on Administrative Disputes allows the court, at the claimant’s request, to suspend the enforcement of an administrative act or immediately halt another administrative action where this is necessary to prevent serious and irreparable harm, while taking into account the public interest and proportionality; the court decides on such a request within seven days.¹⁷ For this

¹⁷ Law No. 08/L-182 on Administrative Disputes, Articles 99–100. <https://gzk.rks.gov.net/ActDetail.aspx?ActID=85181>

mechanism to be effective in practice, the party must know, before demolition, which act is being challenged and have sufficient time to request interim protection.

If the demolition was carried out while a request had already been submitted to the court, of which the wider public had been informed through the media and which the authorities themselves were therefore presumably aware of, it is necessary to examine with particular scrutiny whether the execution effectively frustrated judicial review. The mere filing of a lawsuit does not in every case automatically suspend enforcement, but public authorities must not organize proceedings in such a way that an irreversible consequence occurs before the court has a realistic opportunity to rule on the request for suspension.

5. Inspection, Construction and Water Regime

The Law on Inspections establishes professional inspection procedures, the recording of findings in inspection records, and the adoption of decisions. Specific laws determine which inspector has jurisdiction. In the field of construction, jurisdiction depends, among other things, on the category of the structure: the central Ministry inspector has jurisdiction over structures falling within the relevant higher categories, while municipal inspectors exercise oversight at the local level. Additional restrictions may apply under the water and spatial-planning regime, but these too must be established through an individual act issued by the competent inspector.

It is therefore necessary to obtain answers to the following questions:

1. **What was the legal basis for the demolition** — unauthorized construction, occupation of public property, a water protection zone, the applicable spatial-planning regime, or a combination of these grounds?
2. **Which specific statutory provision determines the competent inspectorate** for the location and structure in each individual case?
3. **Was an on-site inspection carried out and an inspection record prepared**, with the affected party afforded the right to submit comments?
4. **Was a separate decision issued for each structure and each identified user?**
5. **Was the existence of any pending legalization procedure for the structures in question examined, and what was its legal effect?**
6. **Was an opportunity for voluntary compliance established**, including arrangements for the removal of belongings and safeguards for the persons affected?
7. **Who was the formal executor of the demolition?**

Administrative Instruction No. 06/2017 demonstrates the level of precision expected under the construction regime: identification of the holder, structure, address, cadastral zone and parcel; reasoning and supporting evidence; requirements for safe execution; and procedures for handling construction waste. The competent body should carry out an inspection before issuing a demolition permit to assess the situation and determine the conditions necessary to protect public safety and the environment.¹⁸

¹⁸ Administrative Instruction MESP-No. 06/2017 on Setting Procedures for Submission and Review of Applications for Terms of Construction, Construction Permits and Demolition Permits for Category I and II Constructions. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=14823>

6. Unlawfulness of Police Assistance

Law No. 04/L-076 on the Police permits the police, at the request of central or local public institutions, to assist in the performance of public duties where it may reasonably be expected that security will be endangered by possible resistance. Administrative Instruction No. 02/2013 further requires, as a rule, a written request from the competent institution, information on the nature, reasons, place and time of the assistance, confirmation by an authorized official, a police risk assessment, and a decision. Assistance is provided only after the requesting party has fulfilled its legal obligations and where the duty cannot otherwise be performed.¹⁹

Four conclusions follow from this.

First, “Ibar–Lepenac,” as a joint-stock company, is not, merely by virtue of being publicly owned, a central or local public authority that may use a request to transform a private-law dispute into police enforcement. If the request was submitted solely by the company for the purpose of enforcing its own notice, the legal basis for police assistance is seriously questionable. The key factual question that must be clarified is **who formally requested police assistance, on the basis of which act, and following which decision of the competent authority.**

Second, if the request was submitted by the competent Inspectorate, there must be a written record and evidence that a lawful procedure had already been conducted and an enforceable decision adopted before the request was made. The police assist in the enforcement of another authority’s lawful public duty; they do not cure unlawfulness.

Third, Article 43 of the Law on Inspections permits an inspector to request police support where the inspector is obstructed in the performance of official duties. This does not constitute a blanket authorization for the police to carry out a demolition jointly with a company in the absence of an identified inspector and an underlying administrative act.

Fourth, the police were required to limit their role to ensuring security and preventing violence. If police officers ordered persons to vacate the premises, prevented them from returning to collect their belongings, or effectively transferred possession to the company without a valid basis for enforcement, their role would have gone beyond security assistance and into the direct restriction of property rights.

Police assistance is not unlawful by its very nature, but it is contingent upon the lawfulness of both the request and the underlying action. If there is no competent authority, enforceable decision, duly submitted request, and risk assessment, the assistance is *ultra vires*²⁰ and contributes to arbitrary demolition.

¹⁹ Law No. 04/L-076 on the Police, Article 55 <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2806&langid=2>
Administrative Instruction No. 02/2013 on the Manner of Providing Assistance to Government Bodies by the Kosovo Police, Articles 1–6. https://www.kosovopolice.com/wp-content/uploads/2019/10/UDHEZIM_ADMINISTRATIV_NR_02_2013_PER_MENYREN_E_OFRIMIT_TE_NDIHME_S_ORGANEVE_QEVERITARE_NGA_POLICIA_E_KOSOVES.pdf

²⁰ **Ultra vires** (Latin) – a term referring to action by a public authority beyond the powers conferred upon it by law, or exceeding the limits of its statutory jurisdiction.

7. Violations of the Provisions of the Constitution of Kosovo

7.1 Article 46 – Protection of Property

Article 46 guarantees the right to property, permits the regulation of the use of property by law, and prohibits arbitrary deprivation of property. Constitutional protection is not limited solely to undisputed cadastral ownership of land. It may extend to ownership of a structure, belongings located within the structure, contractual or other proprietary claims, as well as a sufficiently established legitimate property interest.

Demolition constitutes the most intensive possible interference with a structure, as it permanently eliminates its physical substance. It must therefore have a clear legal basis, pursue a legitimate aim, and strike a fair balance. A procedure conducted without a decision issued by a competent authority or without the possibility of prior review bears the characteristics of arbitrariness prohibited by Article 46 of the Constitution of Kosovo.

7.2 Article 31 – Fair and Impartial Adjudication

Article 31 guarantees equal protection of rights before courts, administrative bodies, and holders of public authority, as well as a fair and public hearing before an independent and impartial court. Where an authority physically destroys the subject matter of a dispute before a court has an opportunity to examine its lawfulness and proportionality, judicial protection may become purely retrospective and incomplete.

It is particularly problematic if the company, as an interested alleged owner, effectively acted simultaneously as the requesting party, decision-maker, and enforcer. An impartial public authority must independently verify the company's allegations and provide the opposing party with an opportunity to be heard.

7.3 Articles 32 and 54 – Right to Legal Remedy and Judicial Protection

Article 32 recognizes the right to a legal remedy against judicial and administrative decisions that violate rights or interests, while Article 54 guarantees judicial protection and effective legal remedies. A notice without instructions on legal remedies, an unidentified inspection decision, and rapid demolition may, taken together, prevent the affected person from identifying the proper defendant, the competent court, and the appropriate interim measure.

Effectiveness must be assessed in practice. A remedy that can provide only compensation after destruction, but could not prevent the disputed measure before it was carried out, provides weak protection. Justice may be slow, but delayed justice is no justice at all.

7.4 Articles 22, 53 and 55 – European Convention, the Case-Law of the Strasbourg Court, and Proportionality

Article 22 gives direct effect to the European Convention and its Protocols and accords them priority in the event of a conflict with legislation. Article 53 requires human rights to be interpreted in accordance with the decisions of the European Court of Human Rights. Article 55 permits restrictions only by law, to the extent necessary for the objective pursued, taking

into account the purpose, nature of the right, relationship between the restriction and the objective, and the possibility of less restrictive measures.²¹

For these reasons, the case-law of the European Court of Human Rights is not merely a “decorative” comparative-law argument, but a constitutional benchmark that Kosovo public authorities and courts are required to take into account.

8. Violations of Other Domestic Legislation

The Law on Contested Procedure provides for actions concerning ownership and possession, as well as measures for securing claims. It is relevant in two respects: the company could have sought judicial protection instead of carrying out direct demolition, while the affected persons may seek a determination of their rights, compensation for damages, and interim protection, depending on their legal basis.²²

For challenging an inspection decision or the administrative action itself, the primary avenue is an administrative dispute under Law No. 08/L-182, together with a request for suspension of enforcement/cessation of the action. A constitutional complaint before the Constitutional Court may be brought after the exhaustion of effective legal remedies, invoking Articles 31, 32, 46 and 54, read in conjunction with Articles 22, 53 and 55.

Potential claims for damages and restitution depend on who ordered and who carried out the demolition, as well as on establishing the right to the structure and the amount of the damage. The following should, in particular, be documented and quantified: the value of the structure, movable property, costs of clearing the site, loss of use, alternative accommodation, and non-pecuniary damage where the structure constituted a home.

III The Event Viewed Through the Lens of Article 1 of Protocol No. 1 to the European Convention on Human Rights and the Case-Law of the Strasbourg Court

1. Manner of Application in Kosovo

As of the date of this analysis, Kosovo is not a Contracting Party to the European Convention on Human Rights (ECHR), and an individual cannot directly lodge an application against Kosovo before the Strasbourg Court. This does not, however, diminish the Convention's

²¹ Constitution of Kosovo, Articles 22, 31, 32, 46, 53, 54 and 55. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=3702>

²² Law No. 03/L-006 on Contested Procedure, as amended, in particular the provisions concerning claims, security measures, interim measures, and interference with possession. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2583>

domestic significance, since Article 22 of the Constitution makes it directly applicable, while Article 53 requires domestic authorities to interpret human rights in accordance with the standards and case-law of the European Court of Human Rights.

The European Court's Guide on Article 1 of Protocol No. 1 provides a systematized overview of the Court's case-law; it is not a binding judgment in an individual case.²³

2. Whether the Owners Have "Possessions" Within the Meaning of the ECHR

The term "possessions" has an autonomous meaning. An undisputed ownership right constitutes the strongest basis for protection, but protection may also extend to other rights in rem, contractual claims, and sufficiently established legitimate expectations. A mere hope that unauthorized construction will eventually be legalized is not sufficient. Accordingly, each applicant must demonstrate a specific proprietary interest:

- an agreement or other instrument establishing a right of use;
- evidence of construction and investment;
- long-standing, open possession known to the authorities;
- utility bills and connections authorized by public services;
- cadastral or tax records;
- a duly submitted application for legalization and the legal consequences arising from that application;
- decisions or correspondence from public authorities recognizing a particular status.

These forms of evidence do not automatically legalize a structure. Their function is to demonstrate that a specific economic interest exists which public authorities were not entitled to destroy arbitrarily.

3. The Three Rules of Article 1 of Protocol No. 1

The European Court distinguishes between the general right to the peaceful enjoyment of possessions, deprivation of possessions, and control of the use of property in the general interest. The demolition of a house may constitute a de facto deprivation of the structure itself or, depending on the legal basis and the applicable domestic law, an extremely intensive control of its use.

The classification does not alter the fundamental requirements:

1. **Lawfulness:** the measure must have an accessible, precise, and foreseeable legal basis and safeguards against arbitrariness.
2. **Legitimate aim:** the protection of public property, dam safety, the water regime, and enforcement of construction law may constitute legitimate aims.
3. **Fair balance:** the individual must not be required to bear an excessive burden. The procedure, the conduct of the authorities and the owner, the duration of the authorities'

²³ European Court of Human Rights, *Guide on Article 1 of Protocol No. 1*. <https://rm.coe.int/guide-art-1-protocol-1-ser/native/1680a20cde>

tolerance, the availability of less restrictive measures, compensation, and the individual consequences must be examined.

Lawfulness is the first threshold. An authority cannot justify the absence of a decision issued by a competent authority by invoking a legitimate public objective. The more irreversible the consequence, the stronger the procedural safeguards must be.

4. Examples from the Case-Law of the Strasbourg Court

4.1 *Baykin and Others v. Russia*

In *Baykin and Others v. Russia* (No. 45720/17, judgment of 11 February 2020), the authorities sought the demolition of lawfully registered houses located within a gas pipeline protection zone. The European Court attached particular weight to the unclear and unforeseeable legal framework and to the fact that the authorities had previously registered rights and issued or tolerated relevant acts. It found a violation of Article 1 of Protocol No. 1.²⁴

Application to Gazivode: if the authorities had known about the structures for years, permitted utility connections, received applications, recorded rights, or tolerated their use, and then proceeded to demolition without a clear and individualized decision, such conduct undermines the assertion that the measure was foreseeable. The case does not mean that structures must be allowed to remain in every protected zone; it means that public authorities cannot entirely shift the consequences of their own legal uncertainty and previous inconsistency onto the individual.

4.2 *Öneryıldız v. Turkey* – Illegality Does Not Exclude All Property Protection

In *Öneryıldız v. Turkey* [GC] (No. 48939/99, 30 November 2004), the applicant lived in an illegally constructed house on public land in a settlement that had long been known to and tolerated by the authorities, with certain public services being provided. The Court accepted that the specific economic interest connected with the house could constitute a “possession” within the meaning of the Protocol.²⁵

Application to Gazivode: the opposing party cannot close the discussion with the single word “illegal.” It is necessary to establish what the authorities knew, for how long, whether they provided services, and what specific investments and expectations were created. The case does not confer ownership of public land or guarantee legalization, but it permits protection of the economic value of a structure against arbitrary destruction.

4.3 *Yordanova and Others v. Bulgaria* – Illegality Alone Is Insufficient for the Proportionality Assessment

In *Yordanova and Others v. Bulgaria* (No. 25446/06, 24 April 2012), the case concerned a long-standing settlement on municipal land. The eviction order was based primarily on the unlawfulness of the occupation, without a genuine individualized assessment of the

²⁴ *Baykin and Others v. Russia*, No. 45720/17, judgment of 11 February 2020 — HUDOC.

²⁵ *Öneryıldız v. Turkey* [GC], No. 48939/99, judgment of 30 November 2004 — HUDOC.

consequences and proportionality. The Court found a violation of Article 8 because the domestic proceedings had not allowed for an adequate balancing exercise.²⁶

Application to Gazivode: the description “occupiers” and a general assertion that there was no building permit are insufficient for all structures and all persons. The authority must examine the duration of occupation, the conduct of the authorities, the existence of alternative solutions, and the consequences for persons who actually live there. This is particularly significant for structures possessing the characteristics of a “home”; the argument is weaker in relation to occasional holiday homes without a continuous connection to the property.

4.4 *Ivanova and Cherkezev v. Bulgaria* – Independent Review Before the Demolition of a Home

In *Ivanova and Cherkezev v. Bulgaria* (No. 46577/15, 21 April 2016), the demolition of an illegally constructed house that was the applicants’ only home had been ordered. The Court found a violation of Article 8 because there had been no procedure in which an independent body could assess the proportionality of the demolition in light of the applicants’ personal circumstances. Importantly, the Court did not find a violation of Article 1 of Protocol No. 1 in that case.²⁷

Application to Gazivode: the case is useful for the procedural requirement, not for the proposition that the structures must remain standing. If a house was a person’s actual or only home, there should have been an opportunity for an independent assessment of the specific necessity and consequences before demolition. The reported fact that one family was allegedly given thirty minutes to vacate before demolition further reinforces the need to examine Article 8.

4.5 *Winterstein and Others v. France* – Long-Term Home and Individualized Assessment

In *Winterstein and Others v. France* (No. 27013/07, 17 October 2013), the Court examined the eviction of families who had lived in the same area for a long period. It found a violation of Article 8 because the proportionality and consequences of the eviction had not been sufficiently assessed.²⁸

Application to Gazivode: long-term occupation does not itself create ownership, but it affects the procedural obligation of the authorities to hear the individual and explain why immediate demolition is necessary. The authority should have distinguished newer occasional structures from structures that had been used as homes for decades.

4.6 *McCann v. the United Kingdom* – Right to Have the Proportionality of the Loss of a Home Examined by an Independent Tribunal

In *McCann v. the United Kingdom* (No. 19009/04, 13 May 2008), the Court formulated an important principle: a person facing the loss of his or her home should, in principle, have the

²⁶ *Yordanova and Others v. Bulgaria*, No. 25446/06, judgment of 24 April 2012 — HUDOC.

²⁷ *Ivanova and Cherkezev v. Bulgaria*, No. 46577/15, judgment of 21 April 2016 — HUDOC.

²⁸ *Winterstein and Others v. France*, No. 27013/07, judgment of 17 October 2013 — HUDOC.

possibility of having the proportionality of the measure assessed by an independent tribunal, even where domestic law grants the owner a right to possession.²⁹

Application to Gazivode: even the assumed ownership of “Ibar-Lepenac” does not eliminate the need for independent review where a structure has the characteristics of a home. The company cannot itself be the final arbiter of the proportionality of its own property claim.

4.7 *Rousk v. Sweden* – Irreversible Enforcement Despite a Pending Request for Suspension

In *Rousk v. Sweden* (No. 27183/04, 25 July 2013), a house was sold and the applicant was evicted in connection with a tax debt while proceedings concerning enforcement and a request for suspension were pending. The Court found violations of Article 1 of Protocol No. 1 and Article 8, emphasizing the disproportionate nature of the measure and the manner in which the enforcement was carried out.³⁰

Application to Gazivode: the facts are not identical, but the procedural lesson is directly relevant. Where a request for interim protection is known to exist, the authorities must organize enforcement in such a way that a judicial decision does not arrive only after an irreversible event has occurred. The EU’s public statement that proceedings had reportedly been initiated within the deadline given by the company is particularly relevant.

4.8 *Papamichalopoulos and Others v. Greece* – De Facto Action by Public Authorities May Amount to Deprivation of Property

In *Papamichalopoulos and Others v. Greece* (No. 14556/89, 24 June 1993), the Greek authorities had in practice occupied private land and prevented the owners from using it, although formal deprivation had not been properly carried out. The Court treated the situation as a de facto expropriation and found a violation.³¹

Application to Gazivode: a physical act is assessed by its actual effect, rather than by the label attached to a document. If the company, together with the police, took possession and destroyed the structures without a valid formal procedure, the absence of the words “expropriation” or “enforcement” would not prevent a finding that the public authorities had, in practice, permanently extinguished a protected property interest.

5. Article 8 and the Concept of “Home”

“Home” is an autonomous concept and depends on the existence of sufficient and lasting ties to a particular place. Cadastral registration and a building permit are not decisive, nor does the designation “holiday home” automatically exclude protection. Relevant evidence may include the actual duration of residence, family life, personal belongings, utility bills, children’s schooling, health-related and other ties.

²⁹ *McCann v. the United Kingdom*, No. 19009/04, judgment of 13 May 2008 — HUDOC.

³⁰ *Rousk v. Sweden*, No. 27183/04, judgment of 25 July 2013 — HUDOC.

³¹ *Papamichalopoulos and Others v. Greece*, No. 14556/89, judgment of 24 June 1993 — HUDOC.

Not every house or holiday home can be considered a home, but the authority **could not have presumed in advance that none of them was a home**. In the case of a person claiming to reside there from March to November each year, or a family found in a structure with children, there is at least a serious factual issue that should have been established.

IV MAIN CONCLUSIONS

There are serious grounds for suspecting that the demolition procedure was unlawful and that the competent authorities must produce the legal basis, case file, decisions, evidence of service, enforceability, and the legal basis for police assistance, because:

1. “Ibar–Lepenac” is a central publicly owned enterprise organized as a joint-stock company. It may safeguard property, issue warnings, and initiate proceedings, but it does not have general administrative or enforcement authority to order and carry out demolition on its own.
2. The notice of 3 July 2026 does not, based on its apparent elements, constitute an administrative decision, court decision, or enforceable instrument. The deadline unilaterally set by the company is not the same as a statutory time limit for appealing an act issued by a competent authority.
3. Lawful demolition required a separate inspection procedure, an individualized and reasoned decision, proper service, the possibility of a legal remedy, and established enforceability. Public authorities should be able to demonstrate each procedural step through the official case file.
4. The police may assist a competent authority in the safe enforcement of a decision, but only upon a prescribed request and after that authority has fulfilled its statutory obligations. Police assistance cannot legalize corporate self-help or a non-existent/improperly served decision.
5. The constitutional violations consist of arbitrary interference with property (Article 46), denial of fair and independent review (Article 31), and ineffective legal remedy/judicial protection (Articles 32 and 54), read in conjunction with Articles 22, 53 and 55.
6. The case-law of the European Court does not guarantee the retention of an unauthorized structure. It does, however, strongly support the requirement that, before irreversible demolition, the legal basis, jurisdiction, foreseeability, individual circumstances, and proportionality be established, and that a genuine opportunity for independent review exist.

Note on Evidentiary Weight

This work is an expert analysis based on the material currently available and is not a substitute for representation in a specific case. Facts reported in the media should be substantiated by primary documents, and the burden therefore remains on the authorities to demonstrate their jurisdiction, the content of the relevant acts, their service, and their enforceability.

VP "IBER-LEPENAC"

03.07.2026

Pristiglo: 03.07.2026

 **NDERHARRIA HIDROKONOMIKE "IBER - LEPENC" SH.A**
HYDRO - ECONOMIC ENTERPRISE "IBER - LEPENC" J.S.C.
VODOPRIVREDNO PREDUZEĆE "IBER - LEPENC" D.D.

Utg. "Bil Klinton" br. 11 Pristina, Kosovo Bulevar "Bil Klinton" br. 11 Pristina, Kosovo
Tel: 038/526-070, 525-006, Fax: 038/526-159, E-mail: info@iber-lepenac.org

Od: Faruk Mujka, Glavni Izvršni direktor, VP "Iber-Lepenc" D.D.

Za: Uzurpatora imovine

Predmet: Zahtev za hitno oslobađanje uzurpirane imovine

Datum: 03.07.2026.

Na osnovu službenih evidencija i vlasničku dokumentaciju, Javno vodonprivedno preduzeće "Iber-Lepenc" D.D. je zakoniti vlasnik katastarske parcel[redacted] sa površinom od [redacted] registrovanom u Katastarskoj zoni Veli Brijeg, opština Zubin Potok.

Tokom verifikacije na terenu, utvrđeno je da su u gorepomenutoj imovini izgrađeni objekti (vile) od nepoznatih lica, bez dozvole i bez ovlašćenja od strane zakonskog vlasnika, što predstavlja protivzakonitu uzurpaciju imovine.

Ovim dopisom **ZAHTEVAMO** da u roku od 15 (petnaest) dana od dana prijema/postavljanja ovog zahteva u odgovarajućim objektima:

- da odmah napustite uzurpiranu imovinu;
- da uklonite sve postavljene stvari i gradnje na protivzakoniti način;
- da vratite imovinu u prethodno stanje.

U suprotnom, nakon isteka gorenavedenog roka, naše Preduzeće biće obavezno da preduzme sve pravne radnje za zaštitu svojih prava, u cilju oslobađanja imovine, bez ikakvog dodatnog upozorenja, u kom slučaju će svi troškovi i pravne posledice pasti na vas.

Takođe, obaveštavamo vas da su u vezi sa uzurpacijom ove imovine obavешteni i nadležni organi, odnosno Policija Kosova i organi Inspektorata opštine Zubin Potok, od kojih je zatraženo da preduzmu radnje u skladu sa zakonskim nadležnostima.

Nepostupanje sa vaše strane u određenom roku će rezultirati preduzimanjem daljih pravnih postupaka, uključujući one krivične i upravne, bez ikakvog dodatnog upozorenja.

Ovaj zahtev se smatra dostavljenim i putem postavljanja na mesto događaja, odnosno u svakom objektu (vili).

S poštovanjem,

Courtesy Photo