



SPECIALIST PROSECUTOR'S OFFICE  
ZYRA E PROKURORIT TË SPECIALIZUAR  
SPECIJALIZOVANO TUŽILAŠTVO

**In:** KSC-BC-2023-10  
**Specialist Prosecutor v. Sabit Januzi, Ismet Bahtijari and Haxhi Shala**

**Before:** **Trial Panel I**  
Judge Mappie Veldt-Foglia, Presiding Judge  
Judge Roland Dekkers  
Judge Gilbert Bitti  
Judge Vladimir Mikula, Reserve Judge

**Registrar:** Dr Fidelma Donlon

**Filing Participant:** Specialist Prosecutor's Office

**Date:** 16 December 2024

**Language:** English

**Classification:** Confidential

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**URGENT Joint submission of Plea Agreement  
with confidential Annex 1**

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**Specialist Prosecutor's Office**

Kimberly P. West

**Counsel for Sabit Januzi**

Jonathan Elystan Rees

**Counsel for Ismet Bahtijari**

Felicity Gerry

**Counsel for Haxhi Shala**

Toby Cadman

1. Pursuant to the Decisions<sup>1</sup> and Rule 94 of the Rules,<sup>2</sup> in advance of the plea hearings scheduled for 18 December 2024, the Specialist Prosecutor's Office ('SPO') and Ismet Bahtijari urge the Panel to accept the plea agreement that has been entered into between the SPO and Bahtijari on 16 December 2024 ('Plea Agreement').<sup>3</sup>
2. The SPO and Bahtijari note the Panel's conclusion that the plea agreement between the parties filed on 6 December 2024 does not comply with the requirements of Rule 94(2) for the reasons provided in the Plea Proceedings Decision.<sup>4</sup> The parties have reached a new plea agreement that resolves the issues raised by the Panel, and in the interest of advancing the proceedings expeditiously and simultaneously, ask the Panel to accept it for consideration and to schedule a plea hearing for Bahtijari, during the plea proceedings to be held on 18 December 2024.<sup>5</sup>
3. This filing has been shared with and agreed to by Counsel for Bahtijari.
4. This filing and its annex are filed confidentially pursuant to Rule 82(4) and to give effect to necessary confidentiality to portions of proceedings and existing protective measures.

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<sup>1</sup> Decision on Matters Related to Plea Proceedings, KSC-BC-2023-10/F00612, 29 November 2024, Confidential ('Plea Proceedings Decision'); Decision Setting the Agenda for Hearings on Plea Proceedings, Requesting Submissions and on Related Matters, KSC-BC-2023-10/F00626, 13 December 2024, Confidential, paras 20, 24(c) ('Hearing Decision') (collectively 'Decisions').

<sup>2</sup> Rules of Procedure and Evidence Before the Kosovo Specialist Chambers, KSC-BD-03/Rev3/2020, 2 June 2020 ('Rules'). All references to 'Rule' or 'Rules' herein refer to the Rules, unless otherwise specified.

<sup>3</sup> Annex 1.

<sup>4</sup> Hearing Decision, KSC-BC-2023-10/F00626, paras 11-13.

<sup>5</sup> See Hearing Decision, KSC-BC-2023-10/F00626, paras 19-24.

**Word count: 273**



**Kimberly P. West**

**Specialist Prosecutor**

Monday, 16 December 2024

At The Hague, the Netherlands