



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: 17 December 2024

Language: English

Classification: Confidential

**Submission of Further Revised Indictment
with confidential Annex 1**

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 Decision F00612,¹ and as previously forecast,² the Specialist Prosecutor's Office ('SPO') hereby files a further revised Indictment against Sabit Januzi, Ismet Bahtijari, and Haxhi Shala (the 'Accused'). The attached further revised indictment, which is being submitted in the context of a plea agreement process, shall only take effect in the event that all the Accused enter guilty pleas in accordance with the terms of plea agreements reached between each Accused and the SPO. Further, as noted by the Panel, the submission of the revised indictment 'is without prejudice to the SPO's right to reinstate the withdrawn charges, in the event the Panel does not approve one or more of the revised plea agreements.'³

2. This filing and Annex 1 are submitted as confidential accordance with Rule 82(4). The SPO does not object to the reclassification of this filing as public and will submit a public redacted version of Annex 1.

Word count: 229



Kimberly P. West

Specialist Prosecutor

Tuesday, 17 December 2024

At The Hague, the Netherlands

¹ Decision on Matters Related to Plea Proceedings, KSC-BC-2023-10/F00612, 29 November 2024, Confidential ('Decision F00612'), paras 23, 34(b) (ordering the SPO to submit a revised indictment, withdrawing Count 1 as well as the relevant facts and allegations, taking into account the terms of the revised plea agreements'). The SPO notes that it has also corrected the place of birth of Sabit JANUZI.

² URGENT Submission of revised Indictment, KSC-BC-2023-10/F00619, 6 December 2024, Confidential, para.2.

³ Decision F00612, KSC-BC-2023-10/F00612, para.23.