

In: KSC-BC-2023-10
The 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 Counsel for Sabit Januzi

Date: 23 January 2025

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Januzi Response to F00642

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I. INTRODUCTION

1. On 16 January 2025, the Trial Panel issued order F00642¹.
2. The Defence hereby responds as follows.

II. RESPONSE

3. The 'Agreed Factual Basis' in Annex 1 to the Plea Agreement between the Prosecution and the Defence dated 6 December 2024² contains the full agreed facts for the purposes of plea and sentence. The facts set out therein, and the applicable legal analysis relating thereto, have been the subject of a confirmation decision by the Pre-Trial Judge, following submission by the Prosecution of a draft indictment containing the said allegations, together with evidentiary material supporting the material facts pursuant to Rule 86(3)(a) of the Rules and a detailed outline containing references to the evidentiary material supporting the material facts, pursuant to Rule 86(3)(b) of the Rules.
4. Moreover, at the Plea Hearing on 18 December 2024 and in public session the Defendant:
 - a. confirmed his admission of the facts contained in the plea agreement (Transcript pages 467-471), and thereafter

¹ KSC-BC-2023-10/F00642, *Order for Submission of Evidentiary Material*, Trial Panel I, 16 January 2025, Public

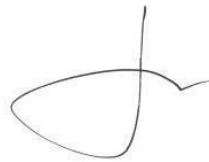
² KSC-BC-2023-10/F00618/A02, *Annex 2 to URGENT Prosecution submissions on plea agreements and sentencing*, Prosecution, 6 December 2024, Public

- b. entered guilty pleas to Count 2 (Transcript page 483) and Count 3 (Transcript page 484) accordingly.

III. CLASSIFICATION

5. This filing is classified as public.

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23 January 2025

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