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In:	**KSC-CA-2022-01**
	The Prosecutor v. Hysni Gucati and Nasim Haradinaj
Before:	**A Panel of the Court of Appeals Chamber**
	Judge Michéle Picard
	Judge Kai Ambos
	Judge Nina Jørgensen
Registrar:	Dr Fidelma Donlon
Filing Participant:	Specialist Counsel for Hysni Gucati
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Public Redacted Version of Re-Filed Gucati Brief in Reply pursuant to Rule 179(3) with one Annex

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Memorandum

The Appellant has an outstanding application for reconsideration of the application to amend the Notice of Appeal relating to the failure to disclose Rule 103 exculpatory material dated 10 October 2020 and 22 April 2022 during the trial (received after the Prosecution had filed the Appeal Response) which in part relates to the TP's finding as to whether Article 6 of the ECHR was complied with in relation to the Entrapment Claim and in part to improprieties with the SITF/SPO's cooperation with Serbia, plus there is outstanding litigation relating to a further item of disclosure ("Item 206") relating to those issues.*

* This applies to the entirety of this document but in particular grounds 4-(4G) and (4H), 17, 18, 19 and 20.

I.INTRODUCTION

1.This Reply only addresses new issues arising from the Appeal Response[1]. The Appeal Response is rejected in its entirety and the absence of a reply to any part of it reflects only that the Appeal Brief[2] fully addresses the relevant matter.

II.SUBMISSIONS

Ground-2-(2A)[3]

2.TPII relied upon the information in the Charts as to the *number* of (potential)witnesses as proof of the *actus reus* for Count 3. The submission that "even if, *arguendo*, the Charts prepared by W04841 were not to have been considered, all crimes would nevertheless have been established" is incorrect.

3.The Defence did not seek leave to appeal the Pre-Trial Judge's decisions ordering non-disclosure as the unfairness arose not out of non-disclosure but instead from TPII's decision to permit the SPO to adduce evidence about the contents of the non-disclosed material.

[1] KSC-CA-2022-01/F00047
[2] KSC-CA-2022-01/F00036
[3] Appeal Response paras.23-36

4.TPII's assertion that the Defence had "not pointed to any legal basis authorising the Panel to grant the relief sought" was taken in the context of the overall admissibility of W04841's evidence after her testimony. The Defence had raised r.138(1)-(3) objections to the content of the declarations being adduced in evidence before the trial[4], whether by way of adducing the declarations under r.154 or whether through oral evidence being given by W04841 addressing the information provided in those declarations[5]. The Defence raised the issue of admissibility again immediately before W04841 gave evidence[6]. TPII repeatedly deferred making a determination on admissibility until ruling KSC-BC-2020-07/F000427, noting that the fact that the TP hears evidence is without prejudice to its determination of the probative value of that evidence and does not prevent the Panel from subsequently excluding that evidence in accordance with r.138[7]. Rule 138 provided a legal basis to authorise TPII to grant the relief sought (exclusion of W04841 testimony, and the declarations and annexes) even at that point in the proceedings, and the Appellant ("A") had pointed TPII to it.

5.*M v Netherlands* is to be distinguished:

a.The complaint in *M* related, in part, to the non-disclosure of material that was not in the possession of the Prosecution[8].

b.All documents that formed part of the Prosecution case were made available to both the applicant and the Dutch Court of Appeal, albeit in redacted form[9].

[4] KSC-BC-2020-07/F00317; KSC-2020-07/F349 paras.7-22 (a reply which was permitted because TP had ruled upon the matter before permitting a response)
[5] KSC-BC-2020-07/F00349 paras.7 and 18,40-42
[6] Transcript 18.10.2021_page.828-829
[7] KSC-BC-2020-07/F00353 para.25
[8] *M v Netherlands* para.68
[9] Ibid para.69

c.It is not clear from the report whether or not the Prosecution had the documents in any other form (i.e. unredacted)[10].

d.The information that had been redacted by AIVD could be of no assistance to the defence[11]. In the present case the undisclosed parts of the impugned documents contained material that fell to be disclosed under r.102(3)/r.103[12]. As regards the issue of classification, the Prosecution in *M* adduced evidence from AIVD that the documents in issue were classified State secret[13]. In the present case, W04841 did not have authority to confirm that the impugned documents were classified[14]. In *M,* the witnesses from AIVD were not investigators of the prosecuting authority but were independent of it. The only issue in *M* in relation to the redacted documents was whether or not they were State secret[15]. In the present case, the *scope* of any such confidential material contained within the impugned documents was also in issue, as was the *content* (e.g. Appeal Brief para.184,197-202,209-212).

Ground-16[16]

[10] Ibid para.3
[11] Ibid para.69
[12] KSC-BC-2020-07/F00141 para.31
[13] *M v Netherlands* para.70
[14] Transcript,20.10.2021,page.1058_lines 8-10,page.1059_lines 11-20,page.1070_line 19 to page.1072_line 20
[15] Ibid para.69
[16] Appeal Response paras.47-51

6.The Defence did not advocate the cumulative convictions test adopted by TPII. It was noted in the Final Trial Brief[17] para.147 that there could be no convictions for multiple offences based on the same course of conduct unless those offences have materially distinct elements: a minimum requirement only.

7.The KSC is a Kosovo domestic court not an extraordinary court.

8.The Kosovo Court system is a hierarchical structure[18] in which the Supreme Court is the highest judicial authority[19], save in relation to the interpretation of the Constitution and the compliance of laws with the Constitution in which case the final authority is the Constitutional Court[20].

9.Specialized courts may be established by law when necessary, but no extraordinary court may ever be created[21].

10.The Law on Specialist Chambers and Specialist Prosecutor's Office Law No.05/L-053 ("Law") attaches Specialist Chambers to each level of the hierarchical court system in Kosovo: the Basic Court of Pristina, the Court of Appeals, the Supreme Court and the Constitutional Court.

[17] KSC-BC-2020-07/F00567 paras.147
[18] Kosovo Criminal Procedure Code 2012,Art.374
[19] Constitution of Kosovo Art.103(2)
[20] Ibid Art.112(1)
[21] Ibid Art.103(7)

11.In relation to offences contrary to the KCC 2019[22], the Court of Appeals is given the function of settling questions of law and fact arising from decisions of the Basic Court. The right of appeal gives rise to the right of the accused to have like cases treated alike.

12.It is plainly the intention of both the hierarchical court system in Kosovo, and the Law which attaches a Specialist Chamber to each level of that system, that the courts of Kosovo (of which the Specialist Chambers form part) will apply a single, unified, coherent and rational corpus of law.

13.This will not be achieved if each first instance Trial Panel of the Basic Court, such as TPII, is free to disregard decisions of law made by the Court of Appeals and to decide the law as it sees fit.

14.For the reasons set out in the Appeal Brief para.279-283, the distinction sought to be made by the Prosecution in the Appeal Response para.50 between *M.I. et al* and the present case is without substance.

Ground-1-(1A) and (1E)[23]

15.The use of intimidation to induce a witness to refrain from making a statement, or to make a false statement, or to otherwise fail to state true information to the police, a prosecutor or a judge, when such information does not relate to obstruction of criminal proceedings, can be prosecuted under Art.386(1.1),(4) and/or (5) KCC.

[22] Criminal Code of Kosovo 2019 Code No. 06/L-074
[23] Appeal Response paras.60-62

16.There is nothing absurd about an interpretation of Art.387 which properly restricts Art.387 offences to the aggravated case "when such information relates to obstruction of criminal proceedings" (in the same way, that there was nothing absurd about the predecessor to Art.387 KCC, Art.310 PCCK properly restricting the offence under Art.310 PCCK to the aggravated case "when such information relates to organized crime").

17.The only absurdity is the meritless distinction as explained in the Appeal Brief para.18, which would follow from the TPII's position that the phrase 'when such information relates to obstruction of criminal proceedings" qualifies only the third of the alternatives in Art.387.

18.In relation to the submission that a finding on only one of the three alternatives was necessary for a conviction under Art.387 KCC, to the extent that TPII found any of the three alternatives made out, it was the third alternative, providing (further) information[24], in relation to which both TPII and the Prosecution agree the 'qualifier' applied.

19.*KS&RB* and *LT* are both first-instance decisions of the Basic Court[25]. The point raised in Ground-1A and 1E was not argued.

Ground-1-(1C)[26]

[24] KSC-BC-2020-07/F00611,para.585 (note: the reference in footnote 13 of the Appeal Brief is a typographical error)
[25] Basic Court of Ferizaj, *KS&RB*, PKR 36/19, Judgment, 10.6.2021; Basic Court of Giljan, *LT*, P 873/2020, Judgment, 12.2.2021
[26] Appeal Response paras.64-66

20.A does not argue that TPII failed to give sufficient weight to the evidence. Instead, A argues that TPII did not find that A used a threat *to inflict serious harm* in the future.

Ground -1-(1D)[27]

21.Art.387 KCC does not govern intimidation specifically of those with information in 'criminal proceedings' but governs intimidation specifically of those with 'information which relates to obstruction of criminal proceedings'.

Ground-2-(2B)[28]

22.Sub-Ground-2(B) is properly made out. TPII relied on material that it previously confirmed that it would not rely on.

23.There is no misrepresentation of TPII's reasoning. The reference by TPII to confirmation by "evidence of … concerns expressed by Witnesses"[29] can only refer to the Contact Notes.

24.TPII erred when it used the "concerns expressed by Witnesses" to *confirm* their findings made earlier based upon the matters complained of in Ground-2-(2A), and

[27] Ibid paras.67-69
[28] Ibid paras.70-71
[29] KSC-BC-2020-07/F00611 para.582

the matters in Ground-2-(2B) cannot be used, accordingly, to sustain the TP's conclusion on the *actus reus* for count 3 in the event that Ground-2-2A is established.

Ground-3[30]

25.TPII did not reach its finding of direct intent on the alternative of inducing someone to 'refrain from making a statement'. TPII did find that the Accused acted with awareness of, and desire for, inducing Witnesses and Potential Witnesses to refrain from giving (further) evidence to the SC/SPO[31], using the terms "evidence" (which does not appear in Art.387) and "information" interchangeably (see Judgment para.585).

26.The *mens rea* for Art.387 KCC does have an 'element of truthful information'. TPII appeared to recognise this when it said in the Judgment para.588 that it would assess whether the Accused acted with the intent of inducing that person to refrain from making a statement or to make a *false* statement or to otherwise fail to state *true* information.

27.It is not a sufficient *mens rea* for Art.387 KCC to intend to induce another to make a *true* statement.

28.Nor is it sufficient to intend to induce another to fail to state *false* information.

[30] Appeal Response paras.72-76
[31] KSC-BC-2020-07/F00611 para.604

29.It is consistent with the above, and with Ground-1-(1A), that it is insufficient to intend to induce another to refrain from making a *false* statement.

30.Further, it does not conflate the *actus reus* requirements with the *mens rea* requirements to submit that the qualifying words, 'when such information relates to obstruction of criminal proceedings' qualify the statement/information that the perpetrator must intend to induce another to refrain from making/fail to state (or to falsely state).

Ground-4-(4A)[32]

31.'Information disclosed in any official proceeding' means 'information disclosed *to him or her* in any official proceeding'.

32.If Art.392(1) KCC did not require the information to be disclosed to the perpetrator in the official proceeding, Art.392(1) would have instead read something like '[w]hoever, without authorization, reveals information disclosed *to him or her or any other person* in any official proceeding'.

33.Any ambiguity is to be resolved by the adoption of the most favourable interpretation to A[33].

34.Art.200 KCC and Art.50 of the Classification Law may not be specifically referenced in the statutory framework of the KSC, but the offence in Art.392(1) KCC was neither

[32] Appeal Response paras.77-78
[33] Article 2(3) KCC 2019

created as the preserve of the KSC nor for the purpose of protecting the KSC (the KSC did not exist when its predecessor Art.400(1) KCC 2012 was drafted).

35.Art.392(1) KCC is to be interpreted in the context of the law of Kosovo as a whole (and not through the narrow lens of the KSC).

Ground-4-(4B)[34]

36.See paragraphs 34 and 35 above.

37.Art.392(1) KCC 2019 cannot mean one thing in the Basic Court of Pristina, but something different in the KSC (which is attached to the Basic Court of Pristina).

38.The classification of information as 'secret' is defined by the Classification Law, which establishes a 'uniform system for classifying and safeguarding information'. The Classification Law applies in the Basic Court of Pristina, and the interpretation of the words 'declared to be secret by a decision of the court or a competent authority' in Art.392(1) KCC 2019 are to be interpreted according thereto.

39.The particulars of count 5 were clear and specifically alleged the "the revelation of *secret* information"-the 'second alternative'-only[35].

[34] Appeal Response paras.79-80
[35] KSC-BC-2020-07/F00251/A01 para.48

Ground-4-(4C)&(4D)[36]

40.Art.62 of the Law and r.106 of the Rules fall within the legal framework of the KSC but for the reasons set out in the Appeal Brief, they establish no general prohibition, expressly or implicitly, on revelation or disclosure of SPO documents.

Ground-4-(4E)[37]

41.The classification of information as 'secret' for the purposes of Art.392(1) KCC 2019 must be interpreted in accordance with the Classification Law, which establishes a "uniform system for classifying and safeguarding information" and applies to all public authorities in Kosovo exercising executive and judicial competences, including the courts[38].

42.See paragraphs 37 and 38 above.

Ground-4-(4F)

43.The Appeal Response does not dissent from the proposition that it was for the SPO to prove that the impugned information had been classified in accordance with the law, i.e. that it was necessary to classify the impugned information as protected or confidential and that that classification had not been carried out abusively.

[36] Appeal Response paras.81-82
[37] Appeal Response paras.83-84
[38] Law No.03/L-178 at Art 1 and 2(1)

44.For the reasons set out in the Appeal Brief para.183-188, no reasonable TP, correctly approaching the burden of proof, could have concluded that the Prosecution had proved to the criminal standard (beyond reasonable doubt) that the information had been lawfully classified.

45.The TPII approached the burden of proof on this issue as if it fell to the Accused to adduce evidence that the SITF/SPO had classified the documents unlawfully. That approach was wrong in law, and unfair especially in circumstances where the documents had not been disclosed to the Accused.

Ground-4-(4G)&(4H)[39]

46.TPII held that 'the revelation of information is "without authorization" if it is not permitted by law'[40]. It follows that if the revelation is permitted by law then it is with authorization and no offence is committed.

47.TPII accepted that revelation in the public interest would be permitted by law but was reluctant to accept that the burden of establishing that the revelation was not permitted by law fell upon the shoulders of the Prosecution.

48.However, it is no justification to say that requiring the Prosecution to prove their case would defeat or undermine the purpose of the provision because some

[39] Appeal Response paras.87-88
[40] KSC-BC-2020-07/F00611 para.486

individuals might not be held criminally responsible despite the commission of an offence[41]. The risk that a guilty Accused is nevertheless entitled to be acquitted if the Prosecution fail to prove guilt beyond reasonable doubt is inherent in the burden and standard of proof set out in Art.21(3) of the Law.

Ground-7[42]

49.The protective measures in Art.5 of the Witness Protection Law are only offered on the basis of the consent of the endangered person[43].

50.The requirement in r.80(2) that "*prior to making an order*, the Panel shall seek to obtain the consent of the person in respect of whom the protective measures are sought" is incompatible with blanket protection for persons as envisaged by TPII.

51.TPII heard no evidence of consent, or of any Panel seeking to obtain consent prior to making an order, or the consideration of specific circumstances relating to, and the opinion of, any person alleged to be protected within the impugned information.

Ground-8-(8A)[44]

[41] Ibid para.487
[42] Appeal Response paras.90-91
[43] Witness Protection Law Art.5.3
[44] Appeal Response paras.92-93

52.The definition of a witness adopted by TPII was neither consonant with the definition of witnesses set out in Law No.04/L-015 nor CERWP/Appendix/Section_1 and was erroneous in law accordingly.

53.The TP should not adopt a definition of an element of the offence charged 'based on the evidence'. The TP should not define the scope of the offence to suit the evidence. The TP should instead define the relevant element, and then assess whether the evidence establishes that element.

54.Judgement Section V(B) does not set out anywhere what crime any individual had information about, or what perpetrator, or what other circumstances relevant to SC proceedings that person might have had information about, and why those circumstances were important to SC proceedings. TPII heard no such evidence.

Ground-8-(8B)[45]

55.A's arguments under this ground are not premised on the incompatibility of marking all information as confidential with the requirement of necessity.

56.A's arguments under this ground target the logical fallacy that all persons named within SITF/SPO documents are *ipso facto* protected.

[45] Appeal Response paras.94-95

57.The issue of a person's status as protected or not is separate to and distinct from the classification and status of a document in which a person's identity may appear[46].

58.The requirement for an assessment of risk to any individual and of the necessity of any protective measure in relation to that individual is the effect of Art.35(2)(f) of Law No.05/L-53 and r.30(2)(a) of the Rules.

59.The Indictment may not have pleaded any specific individual as a protected person under Count 6 but TPII did not hear evidence as to any individual assessment of risk/necessity of protective measure in relation to *any* alleged "Witness/Potential Witness" said to be identified in the SITF Requests and WCPO Responses (until after the indictment period at least).

Ground-9[47]

60.There is a material distinction between 'serious' and 'substantial'.

61.A's arguments on Ground-9 are premised on the different meaning of the words 'serious' and 'substantial'.

62.Establishing 'substantial interference' is patently a lower barrier for the Prosecution to overcome than 'serious consequences'.

[46] Appeal Brief para.220
[47] Appeal Response para.96

Ground-10-(10A)[48]

63.W04842's testimony was not reconcilable and the TP's attempt to reconcile it was directly at odds with the witness' evidence[49].

Ground-10-(10B)[50]

64.The Appeal Response does not dissent from the proposition that the mere assertion of risk could not properly amount to serious consequences without anything further.

Ground-10-(10C)[51]

65.The Appeal Response does not identify any evidence that such negative consequences (e.g. losing access to one's home community and family) actually resulted in relation to the two persons alleged to have been relocated.

Ground-11[52]

66.TPII (and the SPO) simply ignored the evidence that [REDACTED] was somebody who had made it very public, for a number of years, dating back at least to 2012, that

[48] Appeal Response para.98
[49] Appeal Brief paras.254-255
[50] Ibid para.99
[51] Appeal Response para.100
[52] Appeal Response para.102

he had been cooperating with investigators and prosecutors investigating alleged offences committed by the KLA.

67.Whatever climate existed in Kosovo, [REDACTED] had shown no fear of being publicly named as a witness. Indeed he had made it public himself.

68.No reasonable trial panel could have ignored that evidence and found that [REDACTED] suffered fear and concern from being named as a Witness.

69.Reliance on his 'complaint' was unfair for the reasons set out in the Appeal Brief.

Ground-15[53]

70.Footnote to Ground-15(a) should refer to Judgment para.175. The argument should be considered on its merits.

Ground-5[54]

71.The suggestion of Ms Myers, accepted by TPII, that, unlike a whistle-blower, a person "associated" with a whistle-blower need not be in a work or employment relationship with the person or entity whose practices are being denounced, extended

[53] Appeal Response para.114-115
[54] Ibid para.116-123

to where the whistle-blower is not known to the person facilitating the disclosure (giving the obvious example of a journalist who relies on an anonymous source)[55].

72.At Transcript page 2628_lines 13-15, W04842 confirmed that he was aware that on 28 September 2020 a witness implicated a named SPO officer, [REDACTED], as a source of the leak of documents.

73.At Transcript page 2631_lines 9-14, W04842 further confirmed that he was aware that the same witness gave a further interview on 9 November to SPO officers in which he repeated the implication about the SPO officer.

74.That evidence was admitted before TPII and was evidence of both the fact of the implication being made and truth of the implication itself (there being no bar to the admission of hearsay evidence[56]).

75.That evidence was not excluded, but TPII held that it was highly speculative and had been credibly challenged. For the reasons set out in the Appeal Brief para.381-388, those findings cannot be sustained by the evidence on the trial record.

76.A provides argument that TPII's findings in relation to the two media articles is erroneous in the Appeal Brief para.368-369.

[55] Transcript 21.01.2022, pp.3117-3119 at page3118_lines 12-15
[56] KSC-BC-2020-07/F00611 para.24

77.A does not ignore TPII's findings, such as that there was no indication that the documents delivered to A on 22 September 2020 were intentionally leaked by the SPO but argues that they were erroneous[57].

78.The balancing act undertaken by TPII was invalidated by the fact that TPII was ignorant of the full contents of the impugned information revealed by the Accused.

Ground-17[58]

79.The errors of law made by TPII are set out in the terms of Ground-17 itself, with reference to the relevant parts of the Judgment.

80.TPII may have been aware of the correct test to establish whether Art.6 of the ECHR was complied with in relation to the Entrapment Claim, but applied a different and erroneous standard.

81.Entrapment does not require that the subject is 'forced' to act - the nature of the influence exerted such as to incite the commission of an offence that would otherwise not have been committed may be varied.

82.Providing encouragement together with the means without which the offence would not, indeed *could not*, be committed is a sufficient exertion of influence for entrapment, even if: (i) the subject had a predisposition, which he could never act on

[57] Appeal Response paras.354-363
[58] Ibid paras.124-127

without being provided with the means by law enforcement officers, or persons acting under their direction or control; and (ii) having been provided with the means by law enforcement officers, or persons acting under their direction or control, he was not forced to use them.

83.Footnote 45 to the Notice of Appeal should refer to Judgment para.850.

84.The arguments set out in Ground-17B of the Appeal Brief do repeat the allegation of error – see para.350 thereof.

Grounds 18&19[59]

85.See paragraphs 72 to 75 above.

86.The characterisation of the 'two news articles' merely echoes the characterisation used by TPII[60].

87.The errors made by TPII in Grounds-18&19 were components of TPII's erroneous finding that the Entrapment Claim was wholly improbable[61].

Ground-20[62]

[59] Ibid paras.128-132
[60] Ibid para.861
[61] Appeal Brief paras.332-337
[62] Appeal Response paras.162-190

88.None of the authorities cited by the Prosecution at footnote 417 to the Appeal Response go as far as TPII did when rejecting any and all assistance from other sentences for offences of the relevant category.

89.*Brima* provides some assistance in that: (i) it bookends the *lowest* end of the appropriate range of sentences, as Annex 3 to the Appeal Brief made clear; and (ii) identifies one feature of such cases that is relevant to the assessment of culpability and gravity, namely, direct contact with a protected witness.

90.The Prosecution chooses to ignore the cases identified at the top end of the sentencing range which are set out in in Annex 3 of the Appeal Brief[63].

91.Even allowing for differences between those previous cases and A's case, imposing a sentence more than double the sentences in those cases was grossly disproportionate and unjustifiable.

92.None of the passages of the Judgment cited at footnote 442 of the Appeal Response contradict what is submitted at Ground-20(a)(i)(2) and the Appeal Brief para.395, namely that the highest that TPII put Gucati's intent in relation to harm was that he "disregarded, or was indifferent to, the possibility that harm could in fact occur".

93.It was TPII that observed that Gucati mostly revealed the impugned information to the professional media only[64]. As the Prosecution identifies when referring to the

[63] Appeal Brief, A03
[64] KSC-BC-2020-07/F00611 para.499

Judgment para.396, TPII subsequently erred in by failing to appropriately reflect their earlier finding when it came to sentencing.

94.The basis for the conclusions as to how many persons were found to have suffered 'substantial interference' are neither unspecified nor unclear. The Judgment para.547 states that serious consequences (or 'substantial interference') resulted for two Witnesses who were relocated, the Witnesses who were subject to emergency risk planning and for the person who was publicly named as a Witness i.e. [REDACTED].

95.At the time A was required to mitigate, A did not know that TPII would find that [REDACTED] suffered fear and concern from being publicly named (and could not have done in the absence of any evidence).

III.CONCLUSION

96.For the reasons set out in the Appeal Brief and Reply, the appeal should be allowed.

IV.CLASSIFICATION

97.This filing is classified as confidential in accordance with r.82(4).

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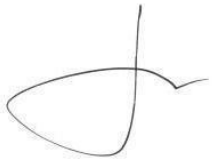

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