



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

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

Before: Pre-Trial Judge
Judge Nicolas Guillou

Registrar: Dr Fidelma Donlon

Filing Participant: Specialist Prosecutor's Office

Date: 10 October 2023

Language: English

Classification: Confidential

**Confidential redacted version of 'Prosecution submissions concerning redactions
to Filing F00002**

with strictly confidential and *ex parte* Annexes 1 and 2'

Specialist Prosecutor's Office

Ward Ferdinandusse

Duty Counsel for Sabit Januzi

Jonathan Elystan Rees

Duty Counsel for Ismet Bahtijari

Hendrik Sytema

1. Pursuant to the Decision,¹ the Specialist Prosecutor's Office ('SPO') hereby proposes the following redactions to Filing F00002² before it is made available to the public (Annex 1) and to the Defence (Annex 2).

Public redacted version

2. The proposed redactions for the publicly available version of Filing F00002 are marked in Annex 1. A number of the proposed redactions relate to [REDACTED].³ A second set of proposed redactions relate to [REDACTED].⁴

3. The risks of including the information contained in the proposed redactions far outweigh the public interest in publishing the information at this stage because proceeding without the proposed redactions would risk [REDACTED].

Confidential redacted version

4. The proposed redactions for the Defence include only references to [REDACTED] and are marked in Annex 2.⁵ Given that the measures referenced in the proposed redactions have no relevance to the charges filed against the Accused, or the basis for their detention, the Accused are not prejudiced in any way by the redaction of this information, [REDACTED].

5. This filing and its annex are submitted as strictly confidential and *ex parte* in accordance with Rule 82(4).

¹ Decision Setting the Date for the Initial Appearances of Sabit Januzi and Ismet Bahtjari and Related Matters, KSC-BC-2023-10/F00017, 6 October 2023 ('Decision'), para.21(f).

² Submission of Indictment for confirmation and related requests, KSC-BC-2023-10/F00002, 26 May 2023 ('Filing F00002').

³ See Annex 1, proposed redactions to [REDACTED].

⁴ See Annex 1, proposed redactions to [REDACTED].

⁵ See Annex 2, proposed redactions to [REDACTED].

Word count: 317

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Ward Ferdinandusse
Acting Deputy Specialist Prosecutor

Tuesday, 10 October 2023

At The Hague, the Netherlands.