**RISK BULLETIN** 

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### Loan sharking leaves people trapped in debt in Kosovo.

Loan sharking is a serious problem in Kosovo, forcing already desperate people into even more precarious positions. Cars and even homes are put up as collateral and seized, sometimes with the connivance of notaries. The phenomenon has received little attention, including from the authorities. Investigations into the cases are rare, and successful prosecutions even rarer. In this issue we look at the problem and what can be done about it.



## Major alleged drug traffickers from the Western Balkans are embracing crypto.

Recent cases reveal that criminal groups in the Western Balkans are increasingly using cryptocurrencies to launder the proceeds of drug trafficking. Opaque digital wallets and the ease of hiding real identities behind pseudonyms are creating major challenges for law enforcement, compounded by a lack of expertise in navigating blockchain transactions. Law enforcement needs to increase its technical capacity as the problem is likely to get worse.



### Balkan criminal profits are being laundered in Ecuador.

Criminal organizations from the Western Balkans have become notorious for shipping cocaine from Ecuador to Western Europe. Ecuador has also become a hub for money laundering, fuelled by dollarization, lenient sentencing and weak regulation of its banking system. One laundering tactic is to buy companies in the export industry, which enables criminals to integrate into the legitimate local economy, launder their money and acquire strategically valuable assets that facilitate the export of cocaine.



# Women are still under-represented in law enforcement and prosecution in the

#### Western Balkans.

Traditionally, policing in the Western Balkans has been a man's world. This is slowly changing, driven in part by the EU accession process. However, there is still a lack of women in leadership positions in both the police and prosecution services. We look at some of the reasons for this and what can be done to shatter the glass ceiling.



#### **ABOUT THIS ISSUE**

In this issue we look at an under-reported type of crime in the Western Balkans: loan sharking. This type of crime traps users in a vicious downward spiral of debt. Illegal moneylenders offer loans to people who need money quickly or who may not have access to bank loans. Interest rates are high and penalties are even higher. Borrowers sometimes end up losing valuable assets such as cars or even their homes. Some have even committed suicide out of desperation. It is estimated that loan sharking in the Western Balkans generates millions of euros in illegal proceeds every year. In this issue, we focus on the problem in Kosovo, but the phenomenon is also present in other parts of the region. The issue deserves more attention, including greater public awareness of the harms of loan sharking and more training for law enforcement to identify and address the problem. Key facilitators in the private sector, such as notaries, should also be made more aware of their responsibilities rather than continuing to profit from desperate clients.

For some time, we have been monitoring cases involving criminal groups from the Western Balkans, such as the Kavač clan, Veljko Belivuk's organization and Albanians involved in cocaine trafficking. Recent investigations have shown that these groups sometimes use cryptocurrencies to launder the proceeds of crime. Some groups in the region have also been arrested for illegal crypto mining and cryptocurrency fraud. In the Western Balkans, as in other parts of the world, there is likely to be an arms race between criminals and police in the coming years to see who can adapt faster and smarter to emerging technologies. In this issue we look at some of the challenges for law enforcement and potential solutions.

In previous issues of this Risk Bulletin, we highlighted the activities of criminal groups from the Western

Balkans in Ecuador. In this issue we follow the money and look at how some of these groups launder the proceeds of crime in Ecuador. Two cases involving Albanian citizens are illustrative of how these groups operate, including using Ecuadorian fruit companies as fronts to import cocaine. One reason the problem seems to persist is that the risk of being convicted is very low. In early 2025, we will publish a report entitled 'Cocaine connections: Links between the Western Balkans and South America', which takes a closer look at the problem.

We try to maintain a strong gender focus in our work. In this issue, we therefore look at the role of women in police and prosecution services in the region. This follows on from our report, 'Integrity and independence of criminal justice institutions in the Western Balkans: Police and prosecution', which was published in November. Our research shows that women's representation in law enforcement in the Western Balkan is often below the EU average, while women's representation in prosecution services is above the EU average in most countries in the region. However, in both cases, women are under-represented in leadership positions. In order to close this gap, it is essential that the Western Balkan countries set specific recruitment targets for women in the criminal justice system, especially in leadership roles, and promote career progression for qualified women. The flip side of this is that the role of women in organized crime is also underestimated. We will examine that phenomenon in a future Risk Bulletin article.

We welcome your feedback and suggestions for new stories. If you would like to get in touch or if you have an idea for a story, please contact Vanja.Petrovic@globalinitiative.net.

## Loan sharking leaves people trapped in debt in Kosovo.

Loan sharking is a serious problem in Kosovo, forcing already desperate people into even more precarious positions. The suicide of one such victim made local headlines in May 2024, but the phenomenon has otherwise received insufficient attention, including from the authorities, despite some cases detected and investigated by law enforcement. Cars and even homes are put up as collateral and seized, sometimes with the connivance of notaries. Although loan sharking is illegal in Kosovo, investigations into the cases are rare — and successful prosecutions even rarer.

Significant loan sharking in Kosovo began in the 1990s, when people had almost no access to bank loans, unemployment was very high and investment opportunities were limited. Although legitimate access to credit increased significantly in first decade of the 2000s, illegal moneylenders continued to offer an alternative to the bureaucratic and cumbersome lending procedures of banks. They often preyed on entrepreneurs who needed financial support for their businesses, providing illegal loans on the same day as a request and without paperwork.

However, such loans clearly came with risks, including extortionate interest rates, especially in the case of late payment, as well as threats, violence and the seizure of assets. Loan sharking in Kosovo is believed to generate millions of euros in illegal proceeds, some of which are linked to money laundering, according to the country's 2020 anti-money laundering risk assessment.<sup>1</sup>

Although widely perceived as a problem, not least by the victims, there is limited data on the extent of loan sharking in Kosovo. There have been few investigations and prosecutions in connection with loan sharking, and

the phenomenon is also not sufficiently addressed by government policies and priorities.<sup>2</sup>

#### Limited but revealing data

Although data on loan sharking is limited, the available statistics give some indication of the prevalence of the crime. For example, between 2021 and 2023, the Kosovo Police dismantled 106 criminal groups, nine organizations (8.5%) on the basis that they were engaged in loan sharking.<sup>3</sup> Of the 740 suspects arrested in connection with organized crime, 78 (10.5%) were found to be engaged in loan sharking. Most of the cases were investigated in Kosovo's Pristina and Peja regions.<sup>4</sup>

Currently, 14 organized crime groups believed to be involved in loan sharking are being investigated by Kosovan police units engaged in tackling organized crime and corruption. <sup>5</sup> Most of the suspects are free while awaiting trial.

According to the Police Inspectorate, four police officers were investigated between 2021 and 2023, resulting in three police officers being arrested and charged on suspicion of loan sharking.<sup>6</sup> In an interview, the head of the police inspectorate acknowledged allegations that other police officers were involved. In a country where there are few investigations into loan sharking, it is not surprising that investigations into police involvement are even rare and more complex.

#### Deeper and deeper in debt

Recent cases show the modalities of the loan sharking and the amounts of money involved. For example, a criminal organization known as the Brezovica group is being investigated by the prosecution service in the south-eastern city of Ferizaj. According to the

	2021	2022	2023
Criminal groups dismantled	3	3	3
Arrests	10	35	33

FIGURE 1 Criminal groups dismantled and arrests made for loan sharking, 2021-2023.

Source: Kosovo Police

prosecutor, Rasim Maloku, the group is thought to consist of about 15 people, including owners of big businesses operating in Kosovo.<sup>8</sup>

The victims of this group are estimated to have borrowed around €2 million and paid more than €500 000 a year in interest. One of the victims had got into financial difficulties during the COVID-19 pandemic and turned to the loan sharks for help. He was charged 10% interest per month. In June 2024, police arrested a group from the city of Gjilan who had allegedly lent €50 000 to a businessperson and demanded €600 000 in return on the basis of an interest rate of as much as 20% per month. 11

Falling into the clutches of loan sharks can lead to an expensive downward spiral. In one case in Ferizaj, loan sharks offered to help a heavily indebted 'client' sell his cars in order to repay the loan. The borrower handed over a car, valued at  $\leq 100\,000$ , to the loan sharks, who sold it the same day for  $\leq 60\,000$ , making a profit for themselves but leaving the victim with a  $\leq 40\,000$  shortfall. Such cynical schemes are facilitated by the fact that some loan sharks run their own car dealerships.

To get their cars back, indebted former car owners sometimes agree to lease the car from the dealer or sign a long-term repayment contract — again, at high interest rates. In such deals (which are sometimes formalized by notaries), the debtor agrees that payment default entitles the loan shark to seize their assets. <sup>13</sup> In some cases, the assets are cars; in more extreme cases, houses or apartments have been used as collateral. As a result, victims whose debts have become unpayable have been forced to forfeit their homes by legal private enforcers. <sup>14</sup>

Delays in repaying loans, even by one day, trigger additional interest and penalties. In some cases, loan sharks are unreachable by phone or in person when the debtor tries to pay. However, after a few days, the loan shark will reappear, complain that the loan has not been repaid on time and charge additional penalties.

Although Kosovo has a criminal code that enables the criminal justice system to investigate loan sharking cases, <sup>15</sup> few victims report cases to the police, largely out of fear. In some instances, this is because the police are the loan sharks.

In March 2024, a family from the city of Peja was evicted from their home by police. The recipient of the forfeited property was allegedly a police officer who,

according to the family, had loaned them €80 000 at a monthly interest rate of 10%. <sup>16</sup> The property is valued by the victim at close to €1 million. The Prizren prosecutor's office withdrew the charges against the suspect, stating that there was a lack of evidence that the suspected had committed extortion, while the main victim claimed that he had been threatened and had fled to the US. <sup>17</sup> The accused police officer remains on duty. A police captain was arrested in 2021 on suspicion of loan sharking. He is accused of making a profit of over €17 000 on a loan of €20 000. <sup>18</sup> In 2022, two police officers, including a sergeant, were arrested, while no cases were investigated in 2023. <sup>19</sup>

Loan sharking is sometimes a family business. In July 2024, police arrested a mother and her two sons whose late father had headed a loan-sharking enterprise. The victim in this case had initially received a loan of €14 000 from the father. <sup>20</sup> As the victim was unable to repay the loan, he was forced to take an additional loan from the mother. When he was not able to repay the second loan, he took out two additional loans from the two sons. To cover the last debt, the victim took out a loan of €27 000 from a person outside the family. Only then did the victim inform the police. From an initial loan of €14 000, the victim ended up with a debt of more than €80 000.

Financial ruin is not the only harm caused by loan sharking, however. Witnesses have testified during trials that they were kidnapped or that their relatives were threatened with death. Some victims have even committed suicide, such as a man in Cagllavica, a village near Pristina, who died in May 2024. Another loan shark victim attempted suicide in the city of Mitrovica in October 2023. In both cases, the loan sharks were arrested.

#### Loan sharking in the wider region

Loan sharking is an underestimated and under-reported crime in many Western Balkan countries. <sup>24</sup> In Serbia, loan sharks are well-connected with lawyers and notaries, ensuring the arrangements are formal and certified. <sup>25</sup> In March 2022, Serbia conducted its first operation aimed at combating loan sharking, which resulted in the arrest of eight people accused of money laundering, loan sharking and other crimes. The suspects secured the illegal loans with pledges of real estate through contracts signed by notaries and lawyers. When the loans were not repaid, the accused took ownership of the assets. Authorities seized assets worth nearly €5 million. <sup>26</sup>

In Bosnia and Herzegovina, loan sharking is often associated with groups involved in drug and weapon trafficking or other crimes.<sup>27</sup> However, there have even been cases of criminal groups lending money to police officers, and then extorting them for information and cooperation to repay their debts.<sup>28</sup>

A reliance on informal business arrangements in cashbased societies, together with the ineffectiveness of money laundering prevention and control, enables loan sharks to continue their criminal activities and launder illicit proceeds. While their victims are mired in debt and personal tragedy, loan sharks often use their ill-gotten gains to invest in construction, real estate and car dealerships. They also flaunt their extravagant lifestyles on social media.

Despite lower interest rates, simplified procedures for obtaining bank loans and a growing recognition of the serious financial harm and the inherent threats and violence associated with loan sharking, people in the Balkans continue to take out illegal loans. More attention should be paid to the issue in Kosovo and other Balkan countries to raise awareness of the problem and its

harms, and to prevent people from falling into a debt trap (which can even amount to a death-trap). Some victims have reported that they were unaware of the consequences, while others felt they had no choice despite knowing the risks.

#### Information campaign required

Although various campaigns have been launched to raise public awareness about certain crimes and public safety concerns in Kosovo, there have been no initiatives specifically targeting the dangers and consequences of obtaining illegal loans from loan sharks. To address this gap, it is essential to develop targeted awareness campaigns that focus on educating the public about the risks of loan sharking. These campaigns should highlight the severe financial, legal and personal safety implications of such loans. Private sector actors, such as notaries, should not only inform potential victims about the consequences of such loan contracts, but also inform the authorities if they suspect that loan sharking is taking place. In addition, there is a need for increased training and awareness within government and law enforcement agencies to enable them to better plan and implement effective measures to prevent and combat loan sharking.

- Kosovo Financial Intelligence Unit, National risk assessment of money laundering and terrorist financing, 2020.
- For example, loan sharking receives no mention in the Government Strategic and Operational Plan 2022-2025, nor in the Serious and Organized Crime Threat Assessment or the Strategy against Organized Crime 2018-2022. See Ministry of Internal Affairs, State strategy against organized crime, 2018.
- Communication with Kosovo Police, 20 March 2024, by email.
- Interview with Kosovo Police, June 2024, by email. 4
- Interview with Kosovo Police Inspectorate, 20 June 2024, by
- Kallxo, Fajdetë, korrupsioni dhe krimi në Polici, YouTube, 26 May
- Interview with Rasim Maloku, Pristina, 27 June 2024.
- Naser Sertoli, Dosja e biznesmenëve që dyshohen për miliona euro fajde, Kallxo, 5 March 2023.
- 10 Pronari i kompanisë së lëngjeve nga Podujeva i dyshuar për fajde, Kallxo, 5 March 2023.
- 11 Aksion kundër të dyshuarve për fajde në Gjilan Pamje, Kallxo, 21 June 2024.
- 12 Naser Sertolli, Dosja e biznesmenëve që dyshohen për miliona euro fajde, Kallxo, 5 March 2023.
- 13 Kallxo, Familja Brdakiç largohet me urdhër përmbarimor nga prona, YouTube, 19 May 2024.
- 14 Ibid.
- 15 Official Gazette of the Republic of Kosovo, Code no.06/L-074 Criminal Code of the Republic of Kosovo, 14 January 2019.

- 16 Kallxo, Denoncimi i fajdesë, YouTube, 19 May 2024.
- 17 Ibid
- 18 Dosja e Prokurorisë: Kapiteni i Policisë i dha fajde 20 mijë dhe përfitoi mbi 17 mijë euro nga to, Kallxo, 18 June 2021.
- 19 Interview with Kosovo Police Inspectorate, 20 June 2024, by
- 20 Kallxo, Emisioni #KallxoPernime Dosja e fajdeve, YouTube, 27 July 2024.
- 21 Qazim Hasanaj, Gruda: Fajdexhinjtë Kërcënuan se do të ma Shfarosnin Familjen, Kallxo, 18 January 2017.
- 22 Fajdexhinjtë e Lipjanit I arrestuari para një muaji e gjysmë mori një Range Rover nga i vetëvrari, Insajderi, 15 May 2024; Arrestohet i dyshuari për fajde dhe për shtytje për vetëvrasje, Kallxo, 11 July
- 23 Sinjali, E rëndë: 56-vjeçari në Mitrovicë tentoi t'i jap fund jetës për shkak të presionit nga fajdexhinjtë, Sinjali, 7 October 2023.
- 24 Observatory of Illicit Economies in South Eastern Europe, Extortion is underestimated and under-reported in Serbia, Risk Bulletin, Issue 12, GI-TOC, May 2022.
- 25 Observatory of Illicit Economies in South Eastern Europe, Reducing vulnerability to loan sharking in Serbia, Risk Bulletin, Issue 9, GI-TOC, September 2021.
- 26 Zelenašenje pre bilo na reč i pretnju, evo kako danas funkcioniše i koja je 'stara srpska boljka', 021, 27 December 2021.
- 27 Council of Ministers of Bosnia and Herzegovina, Radna grupa za izradu Strategije za borbu protiv organizovanog kriminala u Bosni i Hercegovini za period 2021-2024. godine, December 2021.
- 28 Interview with a senior police inspector, 5 July 2024, Mostar.

# Major alleged drug traffickers from the Western Balkans are embracing crypto.

Since the advent of bitcoin 15 years ago, cryptocurrencies have gradually become popular among criminals in the Western Balkans due to improvements in their liquidity, impenetrable digital wallets and the ease of hiding real identities behind pseudonyms. Major alleged criminal organizations in the region therefore rely in part on virtual assets when laundering drug trafficking proceeds. This is creating major challenges for law enforcement, compounded by a lack of expertise in navigating blockchain transactions.

Montenegro's Kavač clan, reportedly a key actor in the international cocaine trade, <sup>1</sup> appears to be a leading regional crypto player. In November 2023, Slovenian prosecutors charged 14 alleged members of the clan's local branch with laundering drug profits through bitcoin, according to N1 Slovenia and other local news sources.<sup>2</sup> This built on an initial May 2021 drug trafficking criminal charge of 48 alleged Kavač clan members.<sup>3</sup>

In the further investigation, the Slovenian prosecutor increased the number of charges against Blaž Kadivec - brother of the suspected cell leader, Klemen Kadivec - from 48 to 73, and described him as the enterprise's 'financial director', N1 Slovenia reported. 4 Messages decrypted by police on the Sky ECC platform reportedly revealed that the group managed its own bitcoin wallet, allegedly overseen by Blaž Kadivec. The prosecution estimates the group earned more than €6 million from drug sales, plus an additional €2.2 million in illegal profits from bitcoin trading, according to N1 Slovenia. <sup>5</sup> Both Kadivec brothers have pleaded not guilty to the charges against them, and the trials are ongoing.

In their home country, Montenegro, the Kavač clan is suspected of using cryptocurrencies in connection with cocaine trafficking. In May 2022, Montenegrin media Libertas, <sup>6</sup> citing a Europol investigation, reported that Ljubo Milović, a fugitive ex-police officer allegedly involved in the cocaine trade on behalf of the Kavač clan, possessed nearly €50 million in cryptocurrency in his virtual wallet, likely stored on Binance, the largest cryptocurrency exchange. Europol believes this money was earned through cocaine smuggling. 8 In 2022 and 2023, Milović was charged with cocaine trafficking and

cash-based money laundering in Montenegro and Serbia. Additionally, Sky ECC messages exchanged by Kavač clan members in November 2020 allegedly mentioned the use of 'coins' - a slang term for bitcoin and referred to a passcode connected to their virtual wallet, known as the 'treasury'. 10

In Serbia, media reports revealed that Veljko Belivuk's organization, which stands accused of cocaine trafficking <sup>11</sup> and working closely with the Kavač clan, <sup>12</sup> allegedly converted over €5 million into bitcoin in 2020 and 2021. <sup>13</sup> A programmer within the group reportedly facilitated this operation and helped them use encrypted communication apps like Sky ECC for their criminal activities. Additionally, Serbian media portal Nova reported that the Belivuk group used Partizan Belgrade's football stadium to mine cryptocurrency, after installing machines in one of its restaurants. 14

Alleged criminals in Albania also stand accused of using cryptocurrencies to hide the proceeds of crime. In August 2024, Albanian authorities, in collaboration with Europol and Belgian, Dutch and French law enforcement, arrested 15 members of an Albanian group. They are suspected, among other crimes, of large-scale drug trafficking and laundering illicit profits through complex cryptocurrency transactions. <sup>15</sup> As far back as 2019, a leading organized crime officer in the UK noted that Albanian drug gangs operating in the UK were laundering profits through cryptocurrency. 16

Cocaine traffickers from South America, Asia and Europe — often with ties to criminals from the Western Balkans — are increasingly using cryptocurrency to launder proceeds. According to Chainalysis, a blockchain data and analysis platform, two suspicious clusters of transactions were identified based on travel patterns, locations and connections to Hydra, the largest darknet drug market that was eventually shut down by German authorities in April 2022. 17 These clusters drew attention because their perpetrators' travel movements mirrored a typical cocaine trafficking route — from South America into Western Europe, then through the Western Balkans into Eastern Europe.

The first cluster's funds travelled from Turkey to Serbia and Bulgaria, while the second moved through Mexico to Spain and Russia. Between 2019 and 2022, these clusters exchanged more than US\$13 million in bitcoin

and collected US\$29 million from Hydra sales, with US\$21 million subsequently laundered through two centralized cryptocurrency exchanges. <sup>18</sup>

#### **NOT JUST MONEY LAUNDERING**

Cryptocurrencies are used for more than just laundering drug money in the Western Balkans. In February 2023, Eurojust announced that it had — in coordination with Europol — dismantled a cryptocurrency fraud network operating from Bulgaria, Cyprus and Serbia that had defrauded victims in Germany, Switzerland, Austria, Australia and Canada of tens of millions of euros. <sup>19</sup>

During Operation Start in Bosnia and Herzegovina in May 2023, law enforcement arrested seven individuals suspected of organized crime, corruption and money laundering. Among the seized items were 248 cryptocurrency mining machines valued at US\$1.2 million.<sup>20</sup> In Kosovo, police conducted several raids in 2023 and seized around 200 illegal cryptocurrency mining machines.<sup>21</sup>

Another significant event was the arrest in Montenegro in March 2023 of crypto entrepreneur Do Kwon, a South Korean national who the US and South Korea wanted for alleged fraud.<sup>22</sup> The collapse of his stablecoin<sup>23</sup> terra and its sister coin luna in 2022 triggered an industry rout that wiped an approximate US\$2 trillion in crypto market value.<sup>24</sup> In the run up to Montenegro's June 2023 elections, Do Kwon sent a letter to Montenegrin authorities claiming that he had a 'very successful investment relationship' with Milojko Spajić, <sup>25</sup> the Europe Now leader who became prime minister and formed a new government in October 2023. US court filings subsequently reportedly showed that Spajić personally invested in Do Kwon's company, Terraform Labs, in 2018.<sup>26</sup> Spajić revealed that, as a citizen, he had given a statement to the prosecution, adding that he would assist the relevant institutions in clarifying all aspects of the ongoing case.<sup>27</sup> On 20 September, Montenegro's Supreme Court ruled that the conditions for Do Kwon's extradition to South Korea and the US were met, but the justice minister has yet to decide which country to extradite him to.<sup>28</sup>

#### Law enforcement challenges

Asset seizure, confiscation and recovery are crucial tools in combating organized crime. However, seizing crypto assets is even more complex than traditional assets such as cash or physical property.

Cryptocurrencies differ from traditional assets due to their decentralized nature and storage in encrypted wallets, which allows cross-border transactions with minimal oversight. This complicates international cooperation and poses a significant challenge for law enforcement authorities, which often lack the necessary legal and practical tools and expertise to address digital crimes.

A major obstacle is accessing and seizing digital wallets. Criminals frequently use multi-signature wallets, which require multiple private keys to authorize transactions, adding another layer of difficulty. Without the cooperation of multiple suspects and access to keys, entering these digital wallets is nearly impossible. Additionally, the pseudonymity of cryptocurrencies

complicates traditional investigative methods, requiring specialized forensic tools and expertise.

Tools for hiding proceeds include mixers, also known as tumblers, whereby an initial crypto holding derived from criminal activity is converted into multiple other crypto-currencies in a chain of transactions through multiple wallets (accounts). <sup>29</sup> This is often done on an exchange that is regulated by a jurisdiction with a weak record of enforcing know your customer (KYC) and wider antimoney laundering (AML) standards, or even on an exchange that has no declared domicile. Some crypto-currency projects, notably Monero, are actively promoted as 'privacy' coins, <sup>30</sup> attracting criminals who seek to avoid the digital footprint left by bitcoin transactions. <sup>31</sup>

#### Upskilling for the digital age

To address the challenges generated by criminals' resort to crypto, law enforcement must invest in advanced blockchain analysis tools and forensic software capable of tracing transactions across multiple blockchains. Cooperation with international partners, including

Europol and Interpol, is essential for sharing intelligence and developing joint strategies to combat transnational crypto-enabled crime networks. Furthermore, training programmes focused on digital assets should be prioritized to equip officers with the skills necessary to investigate and prosecute these cases.

Law enforcement should also advocate for stronger regulatory frameworks that require exchanges and other crypto service providers to implement strict KYC and

AML procedures. Currently, Serbia is the only country in the region that has regulations for virtual currencies. Strengthening the regulatory framework will make it more difficult for criminals to convert illicit funds into legitimate assets without leaving a trace. Effective regulation, combined with enhanced law enforcement capabilities, can significantly disrupt organized criminal groups' ability to exploit cryptocurrencies' vulnerability to money laundering.

- Aleksander Klapp, Rip their skin off, London Review of Books, 46, 8, 25 April 2024; see also Observatory of Illicit Economies in South Eastern Europe, Bloody clashes among Montenegrin clans have not undermined their role in the international cocaine trade, Risk Bulletin 16, GI-TOC, February 2023.
- Razširili obtožnico: obtoženi upravljal z bitcoin denarnico Kavaškega klana, N1 Slovenia, 17 November 2023.
- Criminal Police Directorate of Slovenia, Criminal charge against Klemen Kadivec and others, filed under number KT/8788/2021, 14 May 2021.
- Razširili obtožnico: obtoženi upravljal z bitcoin denarnico Kavaškega klana, N1 Slovenia, 17 November 2023.
- Olivera Lakić, Polakote, što bi rekao jedan čovjek, Libertas, 16 May
- Policajac Ljubo Milović drži 50 miliona na svom računu za kriptovalute?, Press, 17 May 2022.
- Special State Prosecutor's Office of Montenegro, Indictment against Ljubo Milović and others, filed under number Kt-S 93/23, 15 September 2023; Prosecutor's Office for Organized Crime (Serbia), Indictment against Ljubo Milović and others, filed under number KTO 10/23, 9 February 2023.
- 10 Information obtained from a journalist in Montenegro, November
- 11 Andrew Higgins, Arrests shake up a soccer scene in Serbia ruled by gangsters and 'gravediggers', The New York Times, 20 March 2021; Robert F Worth, The president, the soccer hooligans and underworld house of horrors, The New York Times, 1 June 2023.
- 12 In August 2024, Serbian prosecutors charged 19 people, including Belivuk, in connection with a string of murders in Greece in 2020 amid a gang war between the Kavač clan and the Škaljari, a rival Montenegrin clan. Milica Stojanovic, High profile defendants charged over gangland-style murders in Greece, Balkan Investigative Reporting Network, 22 August 2024.
- 13 Kripto Velja: Krvavi keš Belivuk pretvarao u bitkoine, sada je nemoguće ući u trag tom novcu i zapleniti ga, Kurir, 10 March
- 14 Dušan Marković, Otkrivamo Ekipa Velje Nevolje rudarila bitkoine na stadionu i zadužila Partizan milion evra, Nova, 20 October 2022.

- 15 Europol, 15 arrested in crackdown on high-profile Albanian criminal network, 1 August 2024.
- 16 John Simpson, Albanian gangs using bitcoin to flood streets with cocaine, Sunday Times, 3 August 2019.
- 17 Gurvais Grigg, Combatting trafficking with blockchain analysis, Chainalysis, 12 April 2022.
- 18 Ibid.
- 19 Eurojust, Takedown of fraudulent cryptocurrency network in Bulgaria, Cyprus and Serbia, 12 January 2023.
- 20 U Vogošći zaplijenjeno 248 mašina za rudarenje kriptovaluta: Vrijede 1,2 miliona dolara, Dnevni avaz, 12 May 2023.
- 21 Xhorxhina Bami, Seizing crypto-mining equipment has saved Kosovo 'millions', govt claims, Balkan Insight, 17 April 2023.
- 22 Observatory of Illicit Economies in South Eastern Europe, Montenegro's bid for crypto kudos heralds risks, Risk Bulletin, Issue 17, GI-TOC, December 2023; Annabelle Liang, Guy Delauney and Nadeem Shad, Do Kwon: Fugitive 'cryptocrash' boss arrested in Montenegro, BBC, 24 March 2023.
- 23 A stablecoin is a cryptocurrency tied to the value of a national currency or a basket of currencies, often the US dollar or the euro and at 1:1: hence the moniker 'stable'.
- 24 Andrew Higgins, How a crypto fugitive upended the politics of a troubled Balkan nation, The New York Times, 24 June 2023.
- 25 Ibid.
- 26 Jasmina Kuzmanovic and Ava Benny-Morrison, Montenegro premier personally invested in Kwon's crypto holdings, Bloomberg, 20 June 2024.
- 27 Premijer Crne Gore: Afera Do Kvon lažna, Danas, 5 April 2024.
- 28 Supreme Court of Montenegro, Vrhovni sud predmet Do Kvon dostavio ministru radi odlučivanja o dozvoli izručenja, 20 September 2024.
- 29 Bitcoin money laundering: how criminals use crypto, Elliptic, 18 September 2019.
- 30 In a promotional video on its homepage, Monero unabashedly promotes itself as a 'secure, private and untraceable currency'.
- 31 Hannah Murphy, Monero emerges as crypto of choice for cybercriminals, Financial Times, 22 June 2021.

## **Balkan criminal profits are being** laundered in Ecuador.

Ecuador has become a notorious hub for global cocaine trafficking in recent years. Boasting several key ports and perched between two of the world's largest cocaine producers, Colombia and Peru, the once peaceful country has become a strategic node for this booming illegal market. Linked to this, Ecuador has also become a money laundering hub, fuelled by dollarization and gaps in the regulation of its banking system. Western Balkan criminal organizations are among the numerous foreign groups that have come to rely on Ecuador when sourcing cocaine, shipping it to Western Europe and laundering the proceeds.<sup>2</sup> All this has exacerbated violence within Ecuador, particularly among local gangs competing to supply drugs to foreign criminal groups.<sup>3</sup>

#### Integrating into local economies

Money laundering is the second most common criminal activity in Ecuador, behind only drug trafficking. 4 It is estimated that US\$3.5 billion was laundered through Ecuador's financial system in 2021 alone, and the trend is upwards.<sup>5</sup>

To source and ship cocaine, criminal networks from the Western Balkans need to work with local criminal actors and brokers who reside in key transit locations close to supply sources. These brokers, many of whom operate from Ecuador, demand payment in advance. 6 Money is often sent in cash, for example through traditional money transfer companies. Another method uses trade-based money laundering, where dirty money is moved through a company (often through fake invoices) as purported payment for legitimate (but non-existent) goods and services. As a result, substantial amounts of money from Europe and other regions are flowing into Ecuador to fund the purchase and shipment of cocaine. The recipients launder this cash through various channels, including by converting it into gold ingots.<sup>8</sup>

As is the case in many other countries, construction and real estate are also key channels for laundering proceeds. In some provinces of Ecuador, more than half of all houses are reportedly purchased in cash. Western Balkan criminals are reported to be snapping up luxury residences in upscale areas of Guayaquil province to launder illicit proceeds. 10

Another tactic is to buy companies in the export industry, such as banana businesses. <sup>11</sup> This enables criminals to integrate into the licit local economy, launder their money and acquire strategically valuable assets that facilitate the export of cocaine in shipments of perishable fruit.

One case allegedly involves Dritan Gjika, an Albanian citizen who has lived in Ecuador for nearly a decade. There is currently an international arrest warrant out for Gjika, who is wanted for drug trafficking following a major police operation in Ecuador and Spain in February 2024. 12 According to Europol, Gjika was a leader of a criminal group that imported 4 tonnes of cocaine a month to Ecuador from Colombia, before shipping it to Europe and distributing it within the European Union. The organization used Ecuadorian fruit companies as a front to import the drugs. <sup>13</sup> The operation led to the seizure of properties with a value of €48 million -€36 million worth in Ecuador and €12 million in Spain.

In Ecuador, Gjika stands accused of hiding his criminal activities behind a net of companies. According to investigative media reports, Gjika and his business partner in Ecuador, Rubén Cherres — who was murdered in April 2023<sup>14</sup> – had established 12 companies, most of them in the construction and real estate sectors. 15 Eight of these companies were opened in a single day, taking advantage of the Society of Simplified Shares regulation that was established in January 2020 to simplify the procedures and costs of setting up a company in Ecuador. 16 It is believed that his companies exporting various agricultural products, including bananas, were used to facilitate his drug trafficking operations.<sup>17</sup>

Gjika seems to have been adept at spotting opportunities. After Ecuador approved the production, commercialization, use and consumption of cannabis for medicinal or therapeutic purposes in September 2019, 18 he established a company focused on the import, cultivation, harvesting, trading and storage of cannabis.



Cash seized during a police operation in Ecuador in February 2024, which led to the arrest of 30 alleged members of an Albanian criminal group.

Photo: Ecuador police courtesy of Primicias

The Gjika case has attracted significant political and media attention in Ecuador, particularly because Cherres was reportedly a close friend of Danilo Carrera, the influential brother-in-law of former President Guillermo Lasso, who was in office between May 2021 and November 2023. The case was also cited in impeachment proceedings against Lasso. <sup>19</sup>

Another case involves Adriatik Tresa, an Albanian citizen who was murdered in a luxury villa in Guayaquil in 2020. Tresa was under investigation by Ecuadoran authorities for money laundering. <sup>20</sup> He was investigated and sentenced to one year in prison for money laundering in Ecuador in 2014. <sup>21</sup> But he was later acquitted and deemed innocent following an appeal court verdict in 2016. <sup>22</sup> He nevertheless continued his business operations in the country and in 2019 purchased shares in a pharmaceutical company. <sup>23</sup>

In Ecuador, very few people arrested for money laundering are convicted. The country's lenient sentencing and lax attitudes toward this crime appear to be exacerbating the problem. According to the Ecuadorian Observatory of Organized Crime, only 7% of individuals processed for money laundering were convicted between 2020 and 2022. Meanwhile, three out of every 10 individuals processed for money laundering (35.8%) were acquitted.<sup>24</sup>

#### Go after the money, not just the drugs

The ability of Western Balkan criminal organizations to launder and integrate their illicit profits into Ecuador's legal economy, supported by various favourable local policies and conditions, poses serious challenges for national and international law enforcement agencies. In addition to intercepting the flow of drugs from Ecuador to Europe, international law enforcement and local authorities must build on the seizure of properties in Spain and Ecuador earlier this year and work together to identify and disrupt the laundering of cocaine profits locally and internationally. Dismantling this financial infrastructure requires a coordinated effort among states, enhanced intelligence sharing and the implementation of stricter local financial controls.

- 1 Juliana Manjarres, 3 factors that make Ecuador a money laundering hub, InSight Crime, 5 October 2023.
- Walter Kemp, Transnational tentacles: Global hotspots of Western Balkan organized crime, GI-TOC, July 2020.
- 3 Observatory of Illicit Economies in South Eastern Europe, Western Balkans criminal groups are contributing to drug-related violence in Ecuador, Risk Bulletin, Issue 14, GI-TOC, February 2023.
- 4 Renato Rivera, *Caracterazion del crime organizado*, Ecuadorian Observatory of Organized Crime, September 2023.
- 5 Celag, Cuánto dinero se lava en el sistema financiero ecuatoriano. Una aproximación desde las cifras macroeconómicas, 14 January 2023
- 6 Interview with an Albanian investigative journalist with extensive knowledge of criminal organizations operating in Ecuador, Tirana, September 2024.
- 7 Specialized Criminal Chamber of the Provincial Court of Guayas, Transcript of case no. 0912120130611, 11 May 2016. This case on money laundering includes Adriatik Tresa, an Albanian citizen killed in Ecuador in 2020.
- 8 Interview with an Albanian investigative journalist with extensive knowledge of criminal organizations operating in Ecuador, Tirana, September 2024.
- 9 Interview with an Ecuadorian financial expert, Quito, July 2024.
- 10 Interview with an investigative journalist with knowledge of the activity of Western Balkan organized crime groups in Ecuador, Tirana. August 2024.
- 11 Interview with an Ecuadorian investigative journalist, August 2024, online.
- 12 Detenidas al menos 30 personas en un operativo contra la mafia albanesa en España y Ecuador, RTVE Noticias, 6 February 2024; Policía Ecuador, Desarticulamos red transnacional de narcotráfico y lavado de activos, X, 6 February 2024; Mafia albanesa operaba con

- 'información privilegiada' y 'empresarios exitosos' en Ecuador, Primicias, 6 February 2024.
- 13 Europol, Properties worth EUR 48 million frozen after cocaine sweep in Ecuador and Spain, 16 February 2024.
- 14 Center for Economic and Policy Research, Ecuador: Murder of key witness in investigation of President Lasso, others, raises more questions, 3 April 2023.
- 15 Esta es la historia de Dritan Gjika, el albanés socio de Cherres, que hizo negocios con una empresa acusada de narcotráfico, Plan V, 13 February 2023.
- 16 CWCPA, SAS (Society of Simplified Shares) in Ecuador, 28 January 2021.
- 17 Esta es la historia de Dritan Gjika, el albanés socio de Cherres, que hizo negocios con una empresa acusada de narcotráfico, Plan V, 13 February 2023.
- 18 PBP, The National Assembly of Ecuador decriminalizes production and consumption of medical cannabis, 10 January 2020.
- 19 Will Freeman, Crisis in Quito: President Guillermo Lasso heads to impeachment vote, Council on Foreign Relations, 9 May 2023.
- 20 Alessandro Ford, Albanian mafia leaves trail of blood in Ecuador, InSight Crime, 5 January 2021.
- 21 Specialized Criminal Chamber of the Provincial Court of Guayas, Transcript of case no. 0912120130611, 11 May 2016. This case on money laundering includes Adriatik Tresa, an Albanian citizen killed in Ecuador in 2020.
- 22 Ibid.
- 23 Records of the Company National Authority in Ecuador.
- 24 Renato Rivera, Resumen del estudio de sentencias por lavado de activos en Ecuador, 2020–2022, Ecuadorian Observatory of Organized Crime, November 2023.

# Women are still under-represented in law enforcement and prosecution in the Western Balkans.

Traditionally, policing has been a man's world, not least in the Balkans. But this is changing in some countries in the region, driven in part by the EU accession process. In terms of prosecution services, some Western Balkan countries surpass EU standards when it comes to overall gender representation. That said, across both the police and prosecution, there is a dearth of women in leadership positions. The challenge will be to empower women in these sectors to enhance gender parity and improve the operational effectiveness of police and prosecution offices.

In the Western Balkans, as in many parts of the world, policing has long been a male-dominated profession. This is partly due to prevailing stereotypes of both gender and policing, namely that the latter is a confrontational and physically demanding job requiring strength, authority and resilience<sup>1</sup> – traits associated,

rightly or wrongly, with men.<sup>2</sup> As a result, women have traditionally been under-represented in police services in the Western Balkans, particularly in leadership positions.

However, opinions and policies are changing. 'Diversity matters and for all the right reasons,' notes Catherine de Bolle, Executive Director of Europol. 'Policing is a job that is equally fitting for men as for women. Law enforcement should be a mirror to society and gender balanced. There are enough studies to prove this.'<sup>3</sup>

Indeed, studies have shown that a more gender equal police force brings diverse perspectives and experiences to the table. This leads to more inclusive and effective policing strategies that not only better serve all citizens, but also result in tangible improvements in efficiency as well as fostering trust and collaboration between communities and the police. Women often excel in



In Kosovo, women make up less than 15% of the police force.

Photo: Kosovo Police via Radio Kontakt Plus

areas such as communication, conflict resolution and community engagement — skills that are essential for an institution mandated to protect and serve the public.

Furthermore, a gender-balanced force is particularly effective in addressing cases involving domestic violence and sexual assault. Given that domestic violence makes up around one in six crimes reported to the police and 35% of women globally experience gender-based violence within their lifetime, <sup>5</sup> it is crucial to ensure an adequate representation of female officers, who are better placed to provide support and empathy to victims than their male colleagues.

#### **Room for improvement**

Greater representation of women in policing is not only a reflection of changing attitudes in society and towards policing, it is also being spurred by the EU accession process and broader international commitments such as the UN Women, Peace and Security agenda and the 2030 Agenda for Sustainable Development. Gender equality is not only a core value but also a fundamental right recognized by the EU. As a result, it is a key element of criminal justice reform for Western Balkan countries engaged in the process of moving closer to EU norms and commitments.

However, female representation in law enforcement in Western Balkan countries is often below the EU average of 18.5%. According to recent research by the Global Initiative Against Transnational Organized Crime, Serbia and North Macedonia surpass the EU

average, with women constituting 27% and 21% of their respective national forces. However, Kosovo (14.8%), Albania (14.3%) and Montenegro (13.8%) are below the average, and Bosnia and Herzegovina trails considerably behind with a mere 9% of the police force being made up of women. 10

Women are particularly under-represented in leadership positions. In Albania, 10% of police directors are women, while the percentage of female first directors is only 3%. <sup>11</sup> In Bosnia and Herzegovina, the figures are similar, with women occupying just 7% of leadership positions. <sup>12</sup> As shown in Figure 1, leadership positions in Kosovo's police force are overwhelmingly held by men. The situation is even worse in Montenegro where no women currently hold top managerial positions. <sup>13</sup> At the other end of the scale are Serbia and North Macedonia, where women hold 18.6% and 17.8% of leadership positions respectively. <sup>14</sup>

The establishment of associations of female police officers, alongside other efforts such as national gender equality strategies (including the Kosovo Police's 2021–2023 gender equality agenda) signal a growing recognition of the need for gender balance. <sup>15</sup> Such initiatives seek to empower women within the force, including through mentorship, leadership development and targeted recruitment events.

However, the persistence of deep-seated prejudices within the region's police forces create barriers to promotion. Political influence further complicates the

	Women		Men	
Rank	Number	Percentage	Number	Percentage
Colonel	4	14.3%	24	85.7%
Lieutenant colonel	3	6.8%	41	93.2%
Major	8	9.3%	78	90.7%
Captain	15	10.1%	134	89.9%
Lieutenant	27	8.6%	288	91.4%
Sergeant	95	10.9%	776	89.1%
Senior police officer	744	13.9%	4 623	86.1%
Police officer	28	12.6%	195	87.4%
New police officer	100	11.6%	765	88.4%

FIGURE 1 Kosovo Police gender representation by rank.

Source: Kosovo Police

situation, often skewing recruitment and promotion processes (particularly for senior positions) away from merit-based selection and towards decisions influenced by party affiliations. <sup>16</sup> This is a key factor in limiting the number of women in leadership roles and slowing the broader cultural evolution of police forces.

To move beyond token gestures, it is essential to empower women in a myriad of ways and more importantly to focus on tackling the deep-rooted, often macho cultures that pose a challenge to police forces. Political influences that undermine merit-based processes must be addressed, ensuring that recruitment and promotions within the police are based on competence and integrity rather than political considerations.

Increasing the representation of women in police forces should not be a box-ticking exercise to conform to EU standards and requirements. It is a vital step toward improving institutional integrity, enhancing public trust and ensuring that law enforcement agencies reflect the diverse societies they serve.

#### Prosecution: Setting the standard for gender equality

While the police and many other sectors within the criminal justice system in the Western Balkans struggle to achieve gender equality, prosecution offices stand out as leaders in gender representation, often surpassing EU standards. In several Western Balkan countries, women hold a significant presence in prosecutorial roles, reflecting a more balanced and inclusive approach within the legal system.

For example, in Montenegro 62% of state prosecutors are women — significantly higher than the European average of 54%. <sup>17</sup> The majority of prosecutors in North Macedonia are women (55%), <sup>18</sup> including 43% of leadership positions (up from 15% in 2012). <sup>19</sup>

In contrast, Kosovo, with 42.6% female representation in prosecution positions, <sup>20</sup> falls short of the European average. More concerning is the stark underrepresentation of women in leadership positions, since only 3% of these roles are held by women. <sup>21</sup> This disparity highlights significant barriers to female advancement within Kosovo's prosecutorial system.

In Serbia, while 60.2% of prosecutors are women,<sup>22</sup> men continue to dominate leadership roles. For example, in the higher public prosecutor offices, men hold 15 out of 25 high offices.<sup>23</sup> This signifies a persistent glass ceiling, reflecting traditional gender roles.

Albania, while boasting 47.2% female representation at the first instance court level, experiences a sharp decline in female participation at higher levels, with only 20% representation in the Supreme Court and a mere 8.6% in leading prosecutorial positions. <sup>24</sup>

These disparities underscore the ongoing challenges in achieving true gender equality within the prosecutorial systems of the Western Balkans. While countries such as Montenegro and North Macedonia exceed or meet the European average, the persistent male dominance in leadership positions across the region suggests that there is still much work to be done.

Additionally, reducing political influence on appointments and promotions is crucial to fostering a merit-based system that genuinely reflects the capabilities and contributions of female prosecutors. Achieving this will not only bring the region in line with European standards, but also strengthen the overall integrity and effectiveness of its prosecutorial systems.

Efforts by female police officer associations across the region, such as the Women's Police Association of Montenegro, have been instrumental in promoting gender equality. These organizations — through initiatives like mentorship programmes, leadership training and advocacy for inclusive policies — empower women, foster professional growth and work to break down gender barriers within the field.

#### Bridging the gap

To build on these efforts, it is essential that Western Balkan countries implement specific recruitment targets for women within both police forces and prosecution offices, especially in leadership roles, while also developing comprehensive mentorship and leadership development programmes to support their career progression. Targets should also be accompanied by continuous education that challenges stereotypes and empowers women to take on decision-making roles. Additionally, improving the selection and training of managerial staff will help drive systemic change within these institutions.

Another crucial step is enhancing the mechanisms for monitoring and reporting on the progress of gender equality initiatives. This will ensure that policies are not just theoretical but translate into actionable steps that lead to tangible improvements.

Finally, ongoing advocacy and public awareness campaigns are required to shift societal perceptions of law enforcement as a male-dominated field. By highlighting the contributions of women and fostering a

more inclusive environment, the region can attract a more gender diverse talent pool to careers in law enforcement. Empowering women in the police and prosecution is not only about meeting international standards, but also enriching the operational effectiveness of police and prosecution offices, enhancing community trust, and ultimately contributing to the stability and security of Western Balkan countries as they progress towards EU integration.

- Cassandra Deans, Gender inequality: The struggle female police officers face in the masculine culture of policing, *Footnotes*, 8 (2015).
- 2 Andreanne Angehrn et al, 'Suck it up buttercup': Understanding and overcoming gender disparities in policing, *International Journal* on Environmental Research and Public Health, 18, 14 (2021).
- 3 Europol, The female factor: Gender balance in law enforcement, 2013.
- 4 Amalia R Miller and Carmit Segal, Do female officers improve law enforcement quality? Effects on crime reporting and domestic violence, *The Review of Economic Studies*, 86, 5, 2019; Hunter Boehme et al, Female officers in use-of-force encounters: An examination of potential correlates, *Police Quarterly*, 25, 4 (2022).
- 5 Domestic Abuse Commissioner (UK), Distorted police statistics downplay domestic abuse reports, says Commissioner, January 2024; Lisa Denney, Policing and gender, Geneva Centre for Security Sector Governance, 2019.
- 6 Goal number five of the 2030 Agenda seeks to 'achieve gender equality and empower all women and girls'. See UN Department of Economic and Social Affairs, Sustainable Development Goal 5.
- Velina Lilyanova, Women in the Western Balkans: Gender equality in the EU accession process, European Parliament, July 2018.
- 8 Eurostat, Police, court and prison personnel statistics, April 2023.
- 9 Ministry of Internal Affairs of the Republic of Serbia, Ministar unutrašnjih poslova Bratislav Gašić otvorio u Beogradu regionalnu konferenciju Mreža žena u policiji, 13 October 2023; Women are less represented in leadership positions in the police, MKD, 7 March 2024.
- 10 Data for Kosovo comes from the Police Inspectorate of Kosovo, Human resources statistics, 11 January 2024, requested under Article 41 of the Constitution (right to access public information), received by email; for Albania, see Institute of Statistics of Albania, *Burra Dhe Gra*, 2022; data for Montenegro comes from an interview with Biljana Dulovic, an officer with the police analytics department, December 2023; for Bosnia and Herzegovina, see Policewomen's Network Association, More women more trust, 21 December 2023.

- 11 There are four levels of director in Albania's police force; in order of descending seniority, they are: Chief director, senior director, first director and director; the next level down is chief commissioner. Institute of Statistics of Albania, *Burra Dhe Gra*, 2022.
- 12 Interview with a police officer, Mostar, Bosnia and Herzegovina, 16 January 2024.
- 13 Interview with Biljana Dulovic, an officer with the police analytics department, Montenegro, December, 2023.
- 14 Ministry of Internal Affairs of the Republic of Serbia, Ministar unutrašnjih poslova Bratislav Gašić otvorio u Beogradu regionalnu konferenciju Mreža žena u policiji, 13 October 2023; Women are less represented in leadership positions in the police, MKD, 7 March 2024.
- 15 Kosovo Police, Gender equality agenda in the Kosovo Police and action plan 2021–2023, 2021.
- 16 Uglješa Ugi Zvekić and Ioannis Vlassis (eds), Integrity and independence of criminal justice institutions in the Western Balkans: Police and prosecution, GI-TOC, November 2024.
- 17 Council of Europe, European judicial systems CEPEJ evaluation report, 2024 evaluation cycle (2022 data), October 2024, p 67.
- 18 Council of Public Prosecutors of the Republic of North Macedonia, Annual report of the Council of Public Prosecutors 2022, March 2023.
- 19 Ibid.
- 20 Lavdim Makshana, Misadministration of the prosecutorial system, Kosovo Law Institute, June 2023, pp 22–25.
- 21 Ibid
- 22 European Commission for the Efficiency of Justice (CEPEJ), Serbia: Additional CEPEJ questionnaire regarding gender equality in judicial systems, 2019, p 4.
- 23 Ibid.
- 24 Ibid
- 25 Uglješa Ugi Zvekić and Ioannis Vlassis (eds), Integrity and independence of criminal justice institutions in the Western Balkans: Police and prosecution, GI-TOC, November 2024.
- 26 Ibid.

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