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THE IMPUNITY IN KOSOVO: INEXPLICABLE WEALTH

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I. EXECUTIVE SUMMARY

After declaration of independence in 2008, Kosovo underwent judicial and legal reform spearheaded by Kosovo institutions under extensive support of the international community. In addition, also the largest European Union (EU) CSDP Mission – EULEX continues to be deployed with monitoring, mentoring, advising and executive mandate in certain areas of fighting organised crime, financial and economic crimes. Even though with the highest EU financial assistance per capita in Western Balkans, efforts in relation to the fight against corruption and organised crime in Kosovo remain widely ineffective.¹ Lack of political willingness by a government often engrained as corrupt, lacking of sufficient financial support and generally limited influence by Kosovo Assembly and civil society to increase accountability and transparency of the Kosovo institutions have brought Kosovo to a stage of state capture by the executive government.

Legal and policy reforms undertaken in the 2011-2013 years such as the vetting of judges and prosecutors, the drafting of the criminal and criminal procedure codes followed by a new court structure as of 2013, have all stepped up the creation of basic infrastructure on rule of law in Kosovo. However, results in creating a functional state based on rule of law are far from being met in practice. As stated by the 2013 EU Progress Report, Kosovo as a matter of priority needs to offer evidence on the fight against corruption and organised crime by strengthening legislation and its implementation. It also needs to show political and professional willingness to cut the cycle of political interference against the judiciary and strengthen the capacities of judiciary to respond to such pressure, in order to ensure effective implementation of legislation.²

Overall, the investigation and prosecution of senior official's inexplicable wealth has rather been non-existent lacking initiatives by the prosecutorial system. The culture of impunity against strong individuals of the political elite in power continues 14 years after the international intervention in Kosovo. In cases when investigations of economic crimes or misuse of official duties have occurred the orders for sequestration or confiscation of property gained from such offences have been ordered without appropriate legal basis. The cases under investigation reported by official data of the law enforcement and prosecutorial services resulting from the visa liberalisation requirements for Kosovo, have been recorded as a priority however to what extent such investigations are effective and impartial under the EU requirements for Kosovo, remains to be evaluated. Nevertheless, these structures have continued to show results in the increase of numbers and track records of cases however Kosovo remains behind in fully implementing the requirements.

¹ European Court of Auditors Special Report Nr.18 "European Union Assistance to Kosovo related to the Rule of Law," pg. 6 Executive Summary. See at <http://eca.europa.eu/portal/pls/portal/docs/1/19168748.PDF>

² See page 6 and 12, European Commission Progress Report for Kosovo 2013, at http://ec.europa.eu/enlargement/pdf/key_documents/2013/package/brochures/kosovo_2013.pdf

II. BRUSSELS REQUIREMENTS FOR KOSOVO IN THE FIGHT AGAINST CORRUPTION

More than five years after its independence, Kosovo continues to be highly ranked when it comes to the levels of corruption both in the public and private spheres. Regardless of numerous initiatives and adoption of laws Government officials continue to be reported almost on daily basis in media on corruption related affairs. Regardless of many initiatives Transparency International Index³ has refused to promote efforts of GoK and the perceptions of corruptions continue to rank Kosovo globally on the 105th with Algeria, Armenia, Bolivia, Gambia, Mali, Mexico and Philippines with a score of 34 points out of 100, as lowest rank in creating an environment clean from corruption.

Addressing the specificities and the level of corruption in Kosovo, that have been assessed as a risk to EU security, the EU Visa Liberalisation Roadmap for Kosovo and the Feasibility Study for Kosovo set around 150 criteria's for Kosovo in order to advance in its EU free travel and integration processes. As a matter of priority Kosovo institutions have been advised to provide concrete evidence of results in its fight against corruption. This would not include only a track records of cases investigated but a successful rate of prosecutions and convictions including of senior officials involved in corruption.

The realistic fulfilment of these requirements should support the new state of Kosovo in becoming a resilient state for its citizens. Tackling corruption particularly at the level of elected officials,⁴ including requirements such as strengthening the Agency Against Corruption in verifying public officials wealth, a better coordination among the rule of law enforcement bodies, impartial complex investigations of organised crime and corruption by ensuring reliable corruption statistics and the adoption or revision if necessary of anticorruption legal framework and good cooperation with EULEX are a necessary requirements for Kosovo to show willingness in the combat of organised crime and corruption.

The Government of Kosovo has been efficient in proposing new legislation in meeting the EU requirements on Visa Liberalisation with the recent approvals by Assembly of Kosovo of a set of laws addressing issues such as trafficking in human beings, asylum processes, financing of political parties and document security.⁵ This paper substantially analyses if recent government initiatives are in line with the requirements set above.

³ The Corruption Perceptions Index scores countries on a scale from 0 (highly corrupt) to 100 (very clean). See Transparency International, Corruption Perceptions Index for 2012, <http://www.transparency.org/cpi2012/results>, 2011, <http://www.transparency.org/cpi2011/results> and 2010, <http://www.transparency.org/cpi2010/results>

⁴ See Communication from the Commission to the European Parliament and the Council on a Feasibility Study for a Stabilisation and Association Agreement between the European Union and Kosovo, http://ec.europa.eu/enlargement/pdf/key_documents/2012/package/ks_feasibility_2012_en.pdf and Visa Liberalisation with Kosovo Roadmap http://ceas.europa.eu/delegations/kosovo/documents/eu_travel/visa_liberalisation_with_kosovo_roadmap.pdf

⁵ See the adopted laws at Kosovo Assembly Website: The Law on Foreigners, Law on International Legal Cooperation in Criminal Matters, Law on Amending and Supplementing the Law No.03/L-072 on State Border Control and Surveillance, Law on Cooperation between authorities involved in Integrated Border Management, Law on Citizenship of Kosovo, Law on Asylum, Law on Preventing and Combating Trafficking in Human Beings and Protecting Victims of Trafficking and Law on Amending and Supplementing the Law no. 03/L-174 on Financing of Political Parties at http://www.kuvendikosoves.org/common/docs/proc/proc_s_2013_07_31_10_5118_al.pdf

(A) Current state of affairs in the fight against corruption

Kosovo has continued to invest minimally in the judiciary by dividing only 0.47% of GDP budget. In comparison, capital expenditures of the government have been more than 11.2 % of GDP with more than 40% being spent on a single investment project of the highway to Albania. Corruption continues to be considered as one of the factors impeding amongst other Kosovo's economic development and business growth.⁶ Bribe is one of the most common types of corruption that is spread amongst private businesses in Kosovo. The UN Office on Drugs and Crime (UNODC) revealed in their recent report on impact of corruption on private enterprises,⁷ offered worrisome statistics that show that businesses pay bribes in average 7.7 a year or give 1 bribe every seven weeks. More than half of bribes (50.1%) are requested by the public officials while on 38% businesses offer bribes on their own initiative. Officials that are most often offered bribes vary from custom officials (1.9%), tax officials (1.8%), provincial and municipal officials.⁸ As reasons for bribery businesses enlist various factors as: big power of these officials, lack of officials integrity, low wages of public officials, and the influence of strong individuals followed by lack of accountability (Ibid).

The President of Kosovo established an Anti-corruption Council in February 2012, to strengthen the fight against corruption in Kosovo with heavy support of the international community and the US specifically.⁹ However, over time the Council diminished its role without real power of the President to seek concrete results in the fight against corruption. Remaining a more visual portrayal of results rather than concrete evidence of results after its set up in 2012, the President's Council has failed to achieve its mandate in coordination and actions by being relegated to simple reporting and meeting rarely once or twice a year.¹⁰ Major laws sponsored by the government such as the highly debated Law on Amnesty that was eventually changed substantially as unconstitutional by the ruling of the Kosovo Constitutional Court as well as the Law on Declaration of Assets by Senior Public Officials were not under careful attention nor scrutiny of the President's Council.

The track record of cases have increased lately with the Kosovo Police and Kosovo State Prosecutor in taking the lead to hastily offer statistics on the prosecuted corruption cases based on the EU Visa Liberalisation criteria. The court structure has continued to be pressured, with prosecution and police lacking initiatives to take up investigation of corruption and organised crime cases when it comes to investigating the inexplicable wealth of senior officials. Claiming not to have sufficient legal basis to investigate these cases,¹¹ the prosecution and the police have been active in investigating other corruption cases. The focus has been mainly on cases of

⁶ Investments have continued to decline from 2005 with 2012 being the lowest on foreign direct investments in Kosovo at 4.3% of the GDP. With more than 100.000 cases awaiting execution by Kosovo's judiciary, investments in Kosovo have been decreasing. See pg. 11, 22 and 23, European Commission Progress Report for Kosovo 2013, at http://ec.europa.eu/enlargement/pdf/key_documents/2013/package/brochures/kosovo_2013.pdf

⁷ See Business, Corruption and Crime in Kosovo: The impact of bribery and other crime on private enterprise, UNODC report 2013 at http://www.unodc.org/documents/data-and-analysis/statistics/corruption/Kosovo_Business_corruption_report_EN.pdf.

⁸ Ibid.

⁹ See statements issued by the President of Kosovo on the support promised and endorsed by Mrs. Hillary Clinton, former US State Secretary and Attorney General of the US Mr. Eric Holder after meetings held in the US during the visit in 2011. See official Presidential Statements at <http://www.president-ksgov.net/?page=1,6,2105> and, press conference at the International airport of Prishtina upon return of the President from the official visit from the US, <http://www.president-ksgov.net/?page=1,6,2110>

¹⁰ During 2013 the Council met once even though President's decree on its creation foresees quarterly meetings if need arises. Also noted in the pg. 13 of the European Commission Progress Report for Kosovo 2013, http://ec.europa.eu/enlargement/pdf/key_documents/2013/package/brochures/kosovo_2013.pdf

¹¹ KIPRED interview with Kosovo Prosecutorial Council representative, July 2013.

former senior officials lacking the political support of the current government as in the case of indictment of Fatmir Limaj former Vice-President of ruling party PDK (Partia Demokratike e Kosovës), or Ilir Tolaj and Bujar Bukoshi that has been noted for selective selection of investigation in the judgement ruling.

In other cases as noted by the EC Progress Report the links of the police management and the political level have continued to be close.¹² This has led to an increase number of cases reported on investigations of corruption notwithstanding directly politically influenced investigations but also influenced by lack of political willingness to investigate other cases of senior officials that stand close to the current government elite.¹³ Kosovo will need to work hard to be able to deliver structures loyal to the state rather than to particular political parties in power.

Followed with clear instructions of government to prioritise investigation of corruption, the State Prosecutors Office has worked on sole initiative to develop a data base in tracking cases investigated, indicted and sentenced.¹⁴ The data-base was developed without government financial support with the State Prosecutors Office relying completely on its capacities to set up the database that has led to the database facing challenges in collecting information and making it complete.¹⁵ Resources of prosecution continue to be scarce with a number of prosecutors dealing with corruption cases, still remaining low. Until October 2013 there were 124 prosecutors for entire Kosovo making low numbers of prosecutors a continued challenge with not more than twenty prosecutors dealing with corruption as a matter of their priority besides of being involved in other cases.¹⁶ Even though the number of police officers investigating corruption and economic crimes has increased substantially of 96 investigators on economic crimes and corruption of the total staff of 127,¹⁷ sufficient resources are not being offered to the prosecutorial services.

The GoK has continued to provide less than 3% of Kosovo's annual budget in funding courts and State Prosecution,¹⁸ by jeopardising in substance the independence and autonomy of the prosecutorial and judicial structures not followed through with decisive political will to make changes for a rule of law state. This government has publicly declared to support the strengthening of rule of law institutions however it has regressively worked to allow these structures to become independent in their efforts. Noted also in the recent EU progress report for Kosovo the political pressure has continued towards judges and prosecutors that are not appropriately safeguarded by the state with trials continuing to be held in inappropriate premises.¹⁹ This state of affairs has continued to undermine the structures creating a sense of

¹² EC Progress Report for Kosovo 2013, pg.49,

http://ec.europa.eu/enlargement/pdf/key_documents/2013/package/brochures/kosovo_2013.pdf

¹³ KIPRED interview, mid-level management of investigations within a Kosovo law enforcement Agency, October 2013.

¹⁴ KIPRED interview with officials of State Prosecutors Office, June 2013.

¹⁵ KIPRED interview with EULEX advisor to KPC, June 2013.

¹⁶ KIPRED phone call communication with senior official of State Prosecutor's Office, November 2013. The number will increase for 25 prosecutors in beginning of January 2014. For comparison Kosovo has 7.1 prosecutors for 100.000 inhabitants out of 1,739.000 inhabitants whilst Hungary has 17.3, Montenegro 13.4, Denmark 10.3, etc. See pg.6 of KIPRED publication "The Fragile Triangle: Police, judges and prosecutors coordination during criminal proceedings response in Kosovo" (2010) at

http://www.kipred.org/advCms/documents/975_The_Fragile_Triangle.pdf

¹⁷ KIPRED meeting with Head of the Department of KP Directorate of economic crimes and corruption, September 2013 and phone-call communication with official of the Department, November 2013.

¹⁸ KIPRED calculation from Kosovo Budget 2012 at <http://mf.rks-gov.net/sq-al/ministriaefinancave/buxhetiirepublikesekosoves/buxhetiendrore.aspx>

¹⁹ EC Progress Report for Kosovo, 2013 pg.3 at

http://ec.europa.eu/enlargement/pdf/key_documents/2013/package/brochures/kosovo_2013.pdf

loyalty and dependency of judiciary and prosecution from the government rather than aware and enjoying their entitlements as independent and impartial institutions required by the EU. The loyalty has resulted more to the interests of particular corrupt elite in power that continues to be bread with the culture of impunity from investigation and prosecution.

The EU monitoring on the implementation of the requirements for Visa Liberalisation and upcoming negotiated Stabilisation and Association Agreement with Kosovo, should carefully examine track records provided by the state and seek that the fight against corruption should involve and target all political elites in Kosovo and not be seen as a short-term priority for GoK. It has to be looked as a reformative process to build impartial investigations and prosecution advanced by independent and professional structures supported with sufficient human and budgetary resources. The implementation of such EU requirements sustained by strong public pressure for transparency and accountability should in short-term seek to break the culture of impunity for the political elite that has continued to be in safe haven from prosecution whilst in power.

III. THE IMPUNITY OF SENIOR OFFICIALS: THE INEXPLICABLE WEALTH

Between 2008 and 2012, the Agency Against Corruption (ACA) observed significant changes in the declaration of wealth of senior public officials with 9 declarations undergoing changes in the value of millions. After complete verification ACA identified significant changes in 149 cases. In total 51 cases were sent to the Financial Intelligence Unit as suspicions arose over the rise of the declared wealth with other cases send for conflict of interest control.²⁰ During 2012, the ACA managed to verify 800 officials wealth in all institutions, whereas the majority of the significantly changed declarations were 38 officials from the government.²¹ The ACA had the capacity to verify only 20% of the declared wealth of all senior public officials including government officials however this demonstrated the need that the government institutions need to undergo careful scrutiny by ACA as directly involved in major decision-making for Kosovo.

During 2013 the GoK undertook the amendments of the Law on Declaration of Assets by Senior Public Officials justified by the need to give some ‘teeth’ to the law and amend the law in accordance to the new Kosovo Criminal Code that has criminalised false or no reporting of the wealth by senior officials. However the initiative was taken completely in opposite direction from the initial aim. It has shown a tendency of the Government to firstly allow that the ACA will legally be obliged to verify only 20% of all institutions as well as simultaneously try to close down from public scrutiny the declaration of assets by officials. The latter was done with the reasoning that public asset declarations of officials infringe the right to privacy of the public officials backed by the government influenced Agency on Data Protection.²² Opposite to widespread rise of the senior official’s wealth if analysed from 2010 until 2013,²³ the government cooperated with the Agency on Protection of Personal Data to reflect their recommendations to close down publicly the information of wealth of senior officials.

²⁰ See Agency Against Corruption Annual report 2012, http://akk-ks.org/repository/docs/ENG_Raporti_2013-vp.pdf

²¹ Second after the government with biggest changes in wealth declarations are the public enterprises, 22 out of 52.98% controlled. At http://akk-ks.org/repository/docs/ENG_Raporti_2013-vp.pdf

²² The head of the National Agency on Protection of Personal Data that is a body of the Assembly of Kosovo, is a former member and head of Municipal Assembly of Shtime, from the political party in power PDK. See for example Article at <http://gazetajnk.com/?cid=1,3,6165>

²³ See Annual Declarations of Wealth 2010, 2011, 2012 and 2013 at the website of the Agency Against Corruption at <http://www.akk-ks.org/?cid=1,1178>

Only after coordinated efforts of civil society groups and argumentation that closing from public this information would be a set-back for Kosovo's transparency in governance, the sponsoring Ministry withdrew from its initial aim.²⁴ The declared assets have continued to be available to the public only after consistent scrutiny and public pressure.

In stark violation of the requirements of the law, the current declarations of wealth by Kosovo's current legislature are not represented in a transparent manner.²⁵ The declared forms by MPs contain incomplete data especially when it comes to the origin of their wealth. From 41 MP's, 22 MPs (or more than half) for real estate have declared the origin of wealth as family inheritance or joint family property without enlisting the years of property acquirement. Similarly for government cabinet officials 12 out of 22 analysed have declared inheritance for several of their assets, mainly real estate. KIPRED looked into the declaration of assets for 41 MPs, choosing half of the deputies from each of the parliamentary groups of 4 major political parties. In majority of cases mentioned above the total wealth increase is inexplicable if calculated with their annual income.

Even though transparency of the legislative branch is part of good governance standards to be upheld by the MPs, in practice wealthiest MP's do not necessarily provide for the origin of the wealth. As of 2013 the failure to declare assets within the timeframe required by law is punishable by the criminal code with a fine or imprisonment of up to three years. Majority of the MP's in general state inheritance or joint family properties as ways of obtaining wealth however not specifying the year acquired of the inheritance or purchase of the property. Even though the AAC requests that such statements of officials should fully comply with the law requirements, corrected versions of the declarations are not available online.

KIPRED has made a sample selection and analysed MP declarations of assets from the ruling and opposition parties based on the seats in the Kosovo Assembly.²⁶ In the case of the governing party PDK, there are MPs that have not declared their assets.²⁷ Other MP's such as the head of the Parliamentary Group of PDK declared his real estate in total of 1.350.330 €, but the origin and the year of the acquirement of his assets in majority of the assets declared is not available. In another example from PDK MPs,²⁸ ownership of stocks in businesses was declared i.e. 50% of shares, leaving out the monetary amounts earned from the shares and the total wealth. Another MP from opposition party LDK,²⁹ declared 6,601,155 € real estate assets, without stating clearly the date of acquirement i.e. year of origin.

For example from the four largest political parties represented in the Kosovo Assembly, KIPRED noticed inexplicable wealth rise and decrease when compared to different reporting

²⁴ The CSOs that provided written comments to Minister Kuci on their recent draft law were KIPRED, Group for Political and Legal Studies, Kosovo Democratic Institute, Initiative for Kosovo Stability, Movement FOL.

²⁵ Law No. 04/L-050 on Declaration, origin and control of property of senior public officials and on declaration, origin and control of gifts of all public officials, at http://www.md-ks.org/repository/docs/declaration_origin_and_controle.pdf.

²⁶ There were in total 41 members of parliament analysed from which 19 MPs from the biggest parliamentary party Democratic Party of Kosovo (PDK), 12 MP from Democratic League of Kosovo (LDK), 7 MPs from Alliance for Future of Kosovo (AAK) and 3 MPs from Vetevendosje party (VV).

²⁷ For example Mr. Berat Buzhala declared publicly his refusal to declare his wealth in 2013 contrary to the law requirements. The Agency Against Corruption has already pressed charges against him and the case is in proceeding. (KIPRED interview with head of Anti-Corruption Agency, June 2013). In 2012, more than 300 officials had cases in courts due to failure to report their wealth as required by law. See Report of the Agency Against Corruption on analysis of 'How courts handled failure to report wealth of officials in 2012?' at <http://www.akk-ks.org/repository/docs/denimet.pdf>.

²⁸ See declaration of wealth of MP Shaip Muja at <http://akk-ks.org/?cid=1,1192&path=Kuvendi>

²⁹ See declaration of wealth of MP Hashim Dëshishku at <http://akk-ks.org/?cid=1,1192&path=Kuvendi>

years. One MP from the ruling party PDK in 2010-2011 had an increase of wealth of 428%, from 268,863.80 € to 1,419,822.00 €. ³⁰ Later in between 2011 and 2013 the difference noted was of -1%. Similarly another MP from LDK party reported in 2010 an amount of 498,730.35 € wealth whilst in 2011 the wealth increased for 258% to 1,784,700.00 €. ³¹ The later increase 2011-2013 ended with overall 5%. An MP from the AAK also showed an increase from 820,300.00 € to 1,008,900.00 € with an increase of 23 % in between 2011 and 2012. ³² In the case of VV party, one MP declared 10,306,136.00 € ³³ with a decrease of -40% of wealth to 6,896,116.00 €, without clear description on the whereabouts of the wealth that had decreased.

The pattern in reporting the decrease of wealth explained by the fact that the declared wealth is provided by MP's approximately by not stating the accrued wealth increase over years and wealth real price. This is a result of the deficiency of the Law that does not provide for an explicit mechanism that would ensure that each senior public officials property would be checked against the substantive criteria of wealth cost, annual wealth increase and wealth *real* price. The current verification of assets by the Agency Against Corruption (includes merely the verification of the declarations/forms submitted by the senior public officials, without there being a substantive check on each declared property. This being said, the civil society organizations (CSO) ³⁴ met and drafted comments with recommendations that the law should introduce a mechanism that requests the Agency Against Corruption to verify the substance of the property declared by the senior public officials against their real price and existence, while ensuring that the declared property is controlled against substantive and *real* price benchmarks. However, this particular recommendation was not taken forward by the MoJ in the recently amended law.

The concern of the CSO's had to do with the fact that when taking up the mandate all senior officials could also increase the real value of their assets and by declaration of assets over years would claim the decline of their wealth. If recent declarations of wealth in 2013 are checked against the wealth declared in 2012 there is an average increase of 11% for all MPs. In 2011-2012 the increase for 22 MPs out of 41 MPs analysed show an increase of 14% from 34,304,596.12 € to 36,645,798.55 €. In 2013 there has been a decrease to -1% of the overall wealth from 36,645,798.55 € to 32,659,903.97 €. ³⁵ The purposeful misinformation of MPs that their wealth is decreasing over the years will decrease public pressure and scrutiny. With the current law that has recently passed the first reading in the Assembly of Kosovo, leaving only 20% of the assets of senior officials to be verified by the ACC, the probability of removing this trend of reporting by the senior officials remains minor, continuing the impunity from the millions earned from taking up the duty.

In general lack of reporting or false reporting by senior officials is criminalised by criminal code of Kosovo as of 2013. However the recent ACC report on implementation of the law during 2012 has shown a continuing trend of courts to weakly implement the law in force in 2012. From 306 cases of senior public officials filed by the ACC to courts in 2012, the Kosovo budget

³⁰ From 268,863.80 € declared in 2010, in 2011 there were 1,419,822.00 € declared, with a salary income of 27,863.80 €. See at http://akk-ks.org/2010/Kuvendi_i_Republikes_se_%20Kosoves/Deputetet_e_Kuvendit/2010_Xhavit%20Haliti%20-%20Deputet.pdf.

³¹ See declaration of wealth of MP Lutfi Haziri at, http://akk-ks.org/2013/Kuvendi/Lutfi_Haziri.pdf

³² See declaration of wealth of MP Burim Ramadani at, http://akk-ks.org/2013/Kuvendi/Burim_Ramadani.pdf

³³ See declaration of wealth of MP Florin Krasniqi at, http://akk-ks.org/2011/Kuvendi_i_Republikes_se_Kosoves/Florin_Krasniqi.pdf

³⁴ The group consisted of members of NGO's: KIPRED, Group for Political and Legal Studies, Kosovo Democratic Institute, Initiative for Kosovo Stability and Movement FOL.

³⁵ Excluding one reporting MP with a substantial increase in wealth after reflecting the wealth from her newlywed status, see at http://akk-ks.org/2013/Kuvendi/Vjosa_Osmani.pdf.

has been damaged by low sentences issued by courts. With 42% of not resolved cases by courts, other cases were fined in total with 80,870.00 € by first and second instance court judgements. If the corrected fines were issued by courts a total of 765,000.00 € would have been transferred to the Kosovo budget.³⁶ These recent court rulings have shown lack of willingness by judicial bodies to fully implement the law on the criminal acts of few public officials. Courts have had a discretionary role in implementing the law towards senior public officials continuing to breed the culture of impunity.

IV. INVESTIGATION AND CONFISCATION OF INEXPLICABLE WEALTH

Organised criminal groups and corrupt officials have used money laundry in order to infiltrate and gain economic influence in the society.³⁷ In 2000, the UN Convention against Corruption defined ‘illicit enrichment ... a significant increase in the assets of a public official that he or she cannot reasonably explain in relation to his or her lawful income,’ subjected to the fundamental legal principles of the state and its constitutional guarantees.³⁸ In the US and majority of EU countries the criminalisation of illicit enrichment has yet to be tackled whilst majority of developing countries and rising bigger economies have already criminalised it.³⁹ A contradictory term with often uneasy conclusions for various approaches it led many states to have different approaches to combating illicit enrichment. Depending on the level of corruption and organised crime in one state the responses were accordingly crafted.

The phenomenon of inexplicable wealth in Kosovo has been at rise from the onset of the international governance in Kosovo. The impunity against senior public officials a tradition inherited from UNMIK era (1999-2008), continued during and after the end international supervision of the newly independent Kosovo. With Kosovo enhancing its relations with the EU by starting the negotiations on the Stabilisation and Association Agreement, contractual relations of Kosovo and the EU have been put on a steadier pace. In recent years the investigation of inexplicable wealth has been at the centre of the debate for effective fight of corruption and organised crime by civil society groups. Following public and media pressure the investigations of inexplicable wealth were also set by the EU as criteria for Kosovo’s Visa Liberalisation Roadmap.⁴⁰ As an initiative to end the impunity from inexplicable wealth accrued over the years, the EU offered few Directives⁴¹ as guidance on how exactly the Kosovo institutions should fulfil these EU requirements.

³⁶ Another measure that has not been implemented by courts is the measure of prohibition of exercising public function for one year for senior officials. See ACC publication at <http://www.akk-ks.org/repository/docs/denimet.pdf>

³⁷ Pg.9 of the “Financial Investigations and Confiscation of Proceeds of Crime” Training Manual for Law Enforcement and Judiciary, Robert Golobinek for Council of Europe, 2006.

³⁸ Article 20 of the UN Convention Against Corruption at http://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf

³⁹ On the take: Criminalizing Illicit Enrichment to fight Corruption, World Bank publications (December 2012) at <http://issuu.com/world.bank.publications/docs/9780821394540>

⁴⁰ See pg.11 of the Visa Liberalization with Kosovo Roadmap at http://ceas.europa.eu/delegations/kosovo/documents/eu_travel/visa_liberalisation_with_kosovo_roadmap.pdf

⁴¹ See for example the Framework Decision on the fight against organised crime (2008/841/JHA), the Third Anti-Money Laundering Directive (Directives 2005/60/EC and 2006/70/EC), the Framework and Council Decisions on the freezing and confiscation of proceeds of crime (Framework Decisions 2001/500/JHA, 2003/577/JHA, 2005/212/JHA, 2006/783/JHA and Council Decision 2007/845/JHA), the Council Decision on FIU cooperation (Decision 2000/642/JHA), and the Framework Decision on corruption in the private sector (2003/568/JHA) at pg.11 of the Visa Liberalization with Kosovo Roadmap.

Inexplicable wealth rise in Kosovo has been alarming in recent years as from the start of public declarations of wealth at the Agency against Corruption website. Few media have reported on the unjustifiable rise of wealth if comparing annual incomes of the officials. Likewise a number of investments in various construction businesses, energy sector, oil trade or other economic activities led by close relatives or close family businessmen connected to the current political elite have been investigated.⁴² The strategy for political organisation of the current government has been quoted as *clientelism* relationship as public investments have also been based on the interests of parties in power rather than sustainable needs for development of citizens.⁴³ A number of investigative reports by media have shown a pattern of businesses favoured by the main political parties that were supportive during the election campaigns and such favours have been returned after taking up government at local and central levels (Ibid).

Due to the EU set criteria the government undertook few initiatives to address the fulfilment of these criteria's. A legal reform was kicked off during 2011 to address the EU set criteria to start confiscating wealth obtained from criminal acts. Due to lack of prosecutorial initiative to investigate and prosecute organised crime and corruption cases in the past and the hesitance by judges to implement these legal provisions making confiscation almost inexistent.

Therefore a set of legal reforms were undertaken by defining corruption crimes specifically as well as defining procedures for confiscation of wealth in the criminal process. The innovations of the new criminal code allowed that during criminal investigation or filing of indictment the prosecutors have the right to seek temporary sequestration after court orders only. After the end of the legal reform with the past criminal codes illicit enrichment can be confiscated only upon final court judgement.

A) The legal reform 2011-2013

- (1) In 2011 the government initiated the drafting of the Law on preventing and fighting organised crime in Kosovo with an anti-mafia approach⁴⁴ however the law ended up being changed and once the Visa Liberalisation criteria's were set, a softer approach was taken by the government.
- (2) By end of 2011 the government drafted the Law on extended powers in Confiscating Assets acquired by criminal offences⁴⁵ adopted in 2012. The drafting of the anti-mafia law was replaced with this piece of legislation as the government declared worried about possible human rights implications for wider non-conviction based confiscation if used in Kosovo. The declarations varied by Minister Kuçi judging that Kosovo judiciary did

⁴² See for example Preportr Article KEK-Korporata e Korrupsionit (KEK-Energy Corporation of Corruption) at <http://www.preportr.com/sq/Asetet-publike-dhe-privatizimi/KeK-Korporata-e-Korrupsionit-176> and Gazeta JNK article 'The Brother of the Prime-Minister Thaçi builds apartment complex' (April 2012) at <http://gazetajnk.com/?cid=1,987,1952>.

⁴³ Construction companies from Prizren, that is known as a PDK ruling party stronghold have benefitted more during 2010-2011 if compared to companies of other Kosovo municipalities. The research of Forum 2015 has shown a misbalance between Prizren companies that have benefitted from different ministries when compared to Prishtina based companies alone. Only 16 companies from Prizren have gained 71 million Euro from 42 bids when compared to 61 companies in Prishtina that have benefitted 121 million Euros from 123 bids. Also Companies in Shtime, Skenderaj, Drenas, and Ferizaj have received 30 million Euros more than municipalities of Podujeva, Deçan, Istog, and Junik.

See publication 'The weakest Link in Kosovo's Democracy,' Forum 2015. Haracijsa Artan and Bajrami Lorik (2012) 'Public Investments based on interests of the political parties in power, not on the plans and Laws: purchasing political land with public funds.'

⁴⁴ See Government of Kosovo Legislative Strategy at http://www.gapmonitor.org/data/Image/Strategjia_Legjislative_2011.pdf

⁴⁵ See the Law at http://www.md-ks.org/repository/docs/Ligji_per_Kompetencat_e_zgjeruara_%28shqip%29.pdf

not enjoy sufficient legal tradition and non-conviction based confiscation may be wrongfully applied.⁴⁶ The EU Rule of Law mission aware of possible human rights implications had been reluctant to push for the drafting of the law with wider confiscation authority for Kosovo prosecutorial services.⁴⁷ This made the government swiftly get away with the responsibility to draft an anti-mafia style package of laws.

- (3) In January 2013 the new Criminal Code and Procedure Code strengthened the proceedings for the confiscation from proceeds of crime already existing in the previous Codes of 2003.
- (4) Recently in October 2013, the VetëVendosje party initiated a law to offer non-conviction based confiscation and investigation of inexplicable wealth by shifting the burden of proof to the suspected corrupt senior official with prosecution gaining more power in investigating suspected rise of wealth. Nevertheless the human rights violations by the draft law have to be scrutinised carefully including the violation of principle of legality initiated by the draft law.

B) The current state of affairs

Due to the EU requirements Kosovo investigative and prosecutorial services have had a major focus on increasing the track records of the cases investigated on corruption and organised crime cases. Majority of petty corruption cases have been handled by local prosecution whilst EULEX focused on few high profile cases as the criminal conduct has been endangering the functioning of the state and/or stability of public institutions.⁴⁸ Even though there are inexplicable amounts of wealth in the current political elite none of the investigations so far have led to indictments and confiscation of wealth accrued by corruptive behaviours.

Investigations that were undertaken under the last French military commander head of EULEX were criticised by the court of EULEX against a EULEX prosecuted case to have had ‘selective investigation in sentencing particular cases.’⁴⁹ Arrests in few high profile cases were also often followed by tips of the arrests covered by sensational media reports with the arrest of former Permanent Secretary of Ministry of Health Ilir Tolaj (elected during the time of LDK Minister Alush Gashi), arrest of the LDK Head of Municipal Assembly of Prishtina Mr. Sami Hamiti or of the former governor of Central Bank of Kosovo, acquitted of all charges by an EULEX judge at District Court level. In the case of the arrest of former Permanent Secretary in the Ministry of Health, Prime Minister of Kosovo commented the arrest as a result of its priorities to fight corruption. With the start of the fight against corruption firstly with the opposition parties or other weaker political figures as in the case of Mr. Limaj, covered by sensational media reports led to speculative statements of political figures⁵⁰ over the state of affairs on investigation of corruption cases.

Suspicious over politics behind the investigations of corruption in Kosovo have been noted in the past. In 2010, the European Commission reported that the Directorate against Economic Crime and Corruption in charge of police investigations on economic crimes and corruption, has

⁴⁶ See statement by Minister Kuci at a public debate organised by Ministry of Justice on the draft law on extended powers of confiscation. Full Article at <http://www.koha.net/arkiva/?page=1,13,108606>

⁴⁷ KIPRED source, former EULEX staff, 2011.

⁴⁸ See Article 10 of the Kosovo Law on the Special Prosecution Office of Kosovo, at http://www.gazetazyrtare.com/e-gov/index.php?option=com_content&task=view&id=143&Itemid=56&lang=en.

⁴⁹ See Basic Court Prishtina Judgment against Mr. Bukoshi, Mr. Tolaj and others, criticism of Judge Peck of the EULEX prosecutor for selective investigations on the case, pg. 30.

⁵⁰ See for example statement of Head of LDK party Mr. Isa Mustafa on the arrest of the Head of the Municipal Assembly Head, Article ‘Isa Mustafa deklarohet pas arrestimit te Sami Hamitit’ at <http://www.kohaditore.com/?page=1,13,115294>

been prone to political interferences.⁵¹ In the EULEX trial against Fahredin Gashi, sentenced to 18 years imprisonment for war crimes, the cooperative witness to the case Nazim Bllaca had given allegations that Kosovo Police officers (i.e. current Director of Kosovo Police Directorate on Investigation of Economic Crimes and Corruption) had hidden his statement when provided in the KP for murders committed on behalf of an illegal intelligence agency known as Shërbimi Informativ i Kosovës ShiK.⁵² This statement was provided during trial led by EULEX prosecutor against Fahredin Gashi. In 2011 as a result of allegations that senior police officials are affiliated to various illegal intelligence structures in Kosovo, the Minister of Internal Affairs Mr. Rexhepi made a number of changes in the structure of the Kosovo Police. However, after few months the alleged police officers have been returned to the same management position.

Similarly in 2013 the EC notes that close links in between the management of the Kosovo Police and the political level continue.⁵³ Further the report states that Kosovo's Anti-Corruption Task Force continues for months to lack two out of five local prosecutors by slowing investigations for one of the main state mechanisms to fight corruption especially of high profiled cases. Temporary appointments, lack of office space and essential equipment continue to hamper the effective delivery of the mandate of this task force.⁵⁴ In comparison the Kosovo Police Directorate on Economic Crimes and Corruption has been supported by the government and been offered extensive human resources with almost 100 and more investigators.⁵⁵ Accordingly, majority of the data offered by the KP are showing an increase of cases investigated on corruption related crimes.

C) On-going challenges in implementation

During January-August 2013 there were 117 new cases of corruption criminal reports send to prosecutors by the Department of Economic Crimes and Corruption of the Kosovo Police.⁵⁶ Many of the cases reported by the Kosovo Prosecutorial Council have shown that during January-July 2013 there were in total 560 criminal reports against corruption at all levels of prosecutorial services in Kosovo.⁵⁷ There were 51% of cases inherited from the past years of the criminal reports. Out of the remaining cases only 13.1% of cases were indicted with more than 42% of cases being terminated or dismissed. This shows that the new 'autonomy' in investigation of corruption cases by the police continues to show lack of cooperation with prosecution from the onset of the investigations as required by the new criminal and criminal procedure code.

Increase of statistics on the investigations of the corruption cases have not led to many results on the side of financial investigations. Whilst in Kosovo large amounts of money continues to be invested in real estate businesses, casinos or construction businesses often suspected of money laundry initiatives. Low investigations and weak judicial follow-up have been delivered in relation to money-laundry and related crimes. As noted by the EC Progress Report there has been reluctance by law enforcement agencies to initiate financial investigations, resulting with a low

⁵¹ See pg.12 and 56 of EC Kosovo Progress Report 2010.

⁵² See <http://www.eulex-kosovo.eu/en/pressreleases/0207.php>

⁵³ See pg.49 of EC Kosovo Progress report 2013.

⁵⁴ Progress Report for Kosovo 2013.

⁵⁵ KIPRED meeting with Head of the Department of KP Directorate of economic crimes and corruption, September 2013.

⁵⁶ KIPRED email communication with the Directorate for Economic Crimes and Corruption, August 2013.

⁵⁷ Kosovo Performance Assessment Unit Report on the performance of Basic Prosecutions, Special Prosecution of the Republic of Kosovo, Appellate Prosecution and State Prosecutor (First Half of 2013) at http://www.psh-ks.net/repository/docs/Comprehensive_Report_for_all_Basic_Prosecutions.pdf

number of confiscations and sequestrations ordered by the judiciary and executions by the police.⁵⁸

Recent local prosecutorial initiatives in implementing a system of asset confiscation and management have been conducted without a clear legal basis. Under Article 112 of the Kosovo Criminal Procedure Code items seized during a court ordered search may be sequestered. Those items can be confiscated only if listed in the indictment and were proven at trial as facilitating the criminal offence or have resulted as material benefit from the crime convicted. The State Prosecutor in February 2013⁵⁹ ordered to basic prosecutors that the sequestered wealth should be under the supervision and administration of the State Prosecutor, managed by the Agency for the Administration of Sequestered or Confiscated Assets (AASCA). The order was send out for immediate implementation to Kosovo Police, Customs and the AASCA.

In blatant violation of the legal requirements this order has been found to be in complete violation of the recently adopted Criminal Codes.⁶⁰ Opposite to the requirements under Article 264 of the Criminal Procedure Code temporary sequestration can be issued by the prosecutor only once for a maximum of 72 hours. Similarly Article 112.2 of the Code orders that after 5 days the court should have confirmed the temporary confiscation ordered by the prosecutor. In communication with KIPRED, the State Prosecutor has confirmed that during January-June 2013 there has been only 1 case of request by the prosecutor to a judge for temporary sequestration in a corruption related case.⁶¹ From the reports of the AASCA in the period January-June 2013 the agency had 14 decisions for sequestration and confiscation by different bodies. The EULEX mission had only one order for confiscation submitted to the Agency.⁶²

In assessing the efficiency of the investigations and prosecution of corruption analysis shows that detailed statistics should be broken done by measuring track records of cases from the beginning of the case until the end with a number of cases that have lead to convictions. Kosovo until now does not provide for such a system. Furthermore, the legal basis under the new criminal codes has shown weak implementation results with the mandated bodies minimally coordinating and implementing the new legal provisions. Kosovo should carefully consider the current legislation and mechanisms to fight corruption and organised crime by taking note on the immediate need to address the investigations into inexplicable wealth rise as observed by the Agency Against Corruption data.

The recent legal and institutional reforms have not led to tangible results on increasing neither investigation nor prosecution of inexplicable wealth rise in Kosovo. The newly promulgated confiscation measures lag in implementation followed by lack of willingness of the political spectrum to support the development of impartial, professional and autonomous law enforcement agencies and the courts.

⁵⁸ See pg. 50 of the Kosovo Progress Report, 2013.

⁵⁹ State Prosecutor Order Nr.49, dated 20 February 2013.

⁶⁰ See analysis of the EU experts on the Legal Analysis of the legislation for confiscation and sequestration and the Law on Administration of the Sequestered and Confiscated property, Technical Assistance of the EU for Kosovo, July 2013. Copy with KIPRED.

⁶¹ KIPRED email communication with officials of State Prosecutor, June 2013.

⁶² KIPRED email communication with officials of MoJ, August 2013.

V. THE WAY FORWARD

The continuation of illicit enrichment and lack of investigations into the inexplicable wealth accrued in Kosovo over the past years continue to be particularly damaging for Kosovo to create democratic institutions, a national economy based on rule of law principles. Sustained efforts to fulfill the tailor-made EU requirements in the wider rule of law and good governance areas, specifically the fight against corruption, can only be met if there is a strong political will followed through by sufficient human and budgetary resources for judicial authorities, transparency and removal of political influence on the investigative capacities.

The failure to tackle effectively the corruption phenomena is closely linked with the political aspects. Corruption is present at the high level of governance but investigations have not been proportional. Often preserving the institutional stability through the mantra of normalising the relations in between Kosovo and Serbia have led to heavy support of the international community to the on-going political dialogue. The dialogue however has left the corrupt political elite intact by EU conditions bargained against the implementation of the EU requirements under political arrangements. The EU requirements should not only focus on track record of cases but should also weight the success in the fight against corruption against the independence and the autonomy of judicial and law enforcement structures. Only independent and autonomous structures could guarantee to uphold sustainable and stable institutions working in the interest of the state not only of certain political elite. If continuing to offer impunity for its political elite, Kosovo will risk failure as a state. Lack of progress of Kosovo as a state based on rule of law and principles of a democratic state will not only impede the safety of Kosovo citizens but also continue to be a security risk for the EU.

- Kosovo should consider the need to enhance its legal regulation by incorporating further regulation and consider developing the preventative systems for seizure and confiscation of wealth accrued from illegal activities from person's belonging to mafia-type organisations. In these cases Kosovo should consider to use confiscated criminal assets and be returned for the purpose of social interest i.e. social funds;
- Even in cases when criminal convictions have not been decided, Kosovo should consider the confiscation *in rem* of property obtained from crime based on the civil law standard on balance of probabilities rather than the criminal standard of beyond any reasonable doubt. This would shift the burden of proof to the suspected party and enhance the probability of implementation of laws for confiscation by the rule of law institutions;
- In order to strike at the proceeds and assets accrued over years in Kosovo as a result of the impunity from prosecutions of the corrupted political elite, the investigative capacities of the current prosecution should be supported in line with current EU best practices by providing sufficient human and budgetary resources for autonomous and independent law enforcement agencies; Kosovo should consider enhanced legal and constitutional guarantees for ensuring independence and autonomy of prosecutors and judges by also reconsidering structural reviews on the management of the police based upon merit;
- The origin of wealth should be declared and fully verified by the ACA in accordance to the Law on Declaration of Assets and the new requirements of the Criminal Codes by implementing fully the legislation and ending the impunity from verifying all senior

officials wealth and ordering full repaying of damages caused by falsely declared wealth by courts;

- In line with the ongoing negotiations of the chapters for the EU Stabilisation and Association Agreement, the EU should continue to condition Kosovo institutions by seeking internal reform based on the EU best practices to guarantee the full independence and autonomy of the investigative, prosecutorial and court structures. There needs to be a major re-focus on the delivery of the rule of law criteria by ending the tradition of impunity of senior officials due to the sole focus on the political arrangements for the implementation of the Kosovo-Serbia agreement. If continued so Kosovo's statehood will continue to disintegrate and be considered a threat to EU's security in long-term.

ANNEX 1.

Table 1: Total wealth/Government Cabinet ministers

The Total Wealth of the Government Cabinet members							
Name and Surname	2010	2011	Difference from previous year	2012	Difference from previous year	2013	Difference from previous year
	Total Wealth	Total Wealth		Total Wealth		Total Wealth	
Hashim Thaçi	988,827.00	886,742.00	-10%	807,918.00	-9%	792,783.00	-2%
Behgjet Pacolli		171,829,448.93		192,446,753.73	12%	294,979,567.83	53%
Mimoza Kusari-Lila		350,860.00		458,401.64	31%	341,049.13	-26%
Hajredin Kuçi	508,336.00	492,672.00	-3%	527,672.00	7%	510,932.00	-3%
Mahir Yagcilar	292,688.00	258,960.00	-12%	255,182.10	-1%	227,939.97	-11%
Slobodan Petrovic	215,520.00	166,500.00	-23%	183,981.00	10%	203,181.00	10%
Ramë Buja	348,118.00	353,960.00	2%	365,520.00	3%	310,520.00	-15%
Blerand Stavileci	209,887.00	262,469.00	25%	257,769.00	-2%	247,170.00	-4%
Ibrahim Makolli	201,620.00	96,060.00	-52%	93,901.64	-2%	93,801.64	0%
Bedri Hamza	262,464.00	222,280.50	-15%	285,545.17	28%		28%
Agim Çeku		665,048.00		659,848.00	-1%	651,381.00	-1%
Fehmi Mujota	235,678.00	330,841.00	40%	310,572.00	-6%	315,872.00	2%
Memli Krasniqi	155,256.00	160,180.00	3%	70,060.00	-56%	160,860.00	130%
Dardan Gashi		1,353,400.00		1,353,400.00	0%	1,337,400.00	-1%
Nenad Rasic	642,540.00	848,700.00	32%	940,056.00	11%	948,406.00	1%
Bajram Rexhepi	391,000.00	339,600.00	-13%	319,000.00	-6%	393,000.00	23%
Enver Hoxhaj	321,877.00	309,803.42	-4%	253,324.00	-18%	332,448.00	31%
Ferid Agani		346,461.00		313,563.00	-9%	396,055.00	26%
Vlora Çitaku	182,120.00	166,746.00	-8%	161,746.00	-3%	163,446.00	1%
Dalibor Jevtic						543,026.00	
Besim Beqaj	2,555,343.42	1,071,680.00	-58%	1,219,680.00	14%	995,180.00	-18%
Edita Tahiri	572,566.00	565,255.00	-1%	553,375.00	-2%	561,790.60	2%

Table 2: Total wealth of randomly selected Kosovo Assembly MPs

The Total Wealth of the Assembly Deputies							
Democratic Party of Kosovo (PDK)	2010	2011	Difference from previous year	2012	Difference from previous year	2013	Difference from previous year
	Total Wealth	Total Wealth		Total Wealth		Total Wealth	
Adem Grabovci	1,662,500.00	1,683,426.12	1%	1,684,016.46	0%	1,388,246.00	-18%
Jakup Krasniqi	536,880.00	443,247.00	-17%	453,104.26	2%	433,104.26	-4%
Xhavit Haliti	268,863.80	1,419,822.00	428%	1,422,807.50	0%	1,409,649.65	-1%
Fatmir Limaj	1,035,530.00	1,096,078.00	6%	1,002,678.00	-9%	993,138.00	-1%
Azem Sylja	n/a	244,006.00	n/a	290,496.15	19%	219,304.00	-25%
Fatmir Xhelili	n/a	631,700.00	n/a	625,000.00	-1%	619,400.00	-1%
Shaip Muja	n/a	2,355,880.00	n/a	2,355,880.00	0%	2,308,560.00	-2%
Blerta Deliu	n/a	n/a	n/a	2,865,000.00	n/a	2,864,118.00	0%
Bekim Haxhiu	n/a	450,743.00	n/a	467,057.00	4%	464,079.00	-1%
Justina Shiroka -Pula	820,083.90	1,060,482.00	29%	1,219,151.00	15%	1,122,997.32	-8%
Ramiz Lladrovci	n/a	251,286.20	n/a	226,489.20	-10%	158,122.40	-30%
Arsim Bajrami	499,640.00	378,600.00	-24%	379,050.00	0%	398,300.00	5%
Hasime Krasniqi	n/a	327,524.00	n/a	346,560.00	6%	439,540.00	27%
Idriz Vehapi	281,596.00	287,856.00	2%	337,422.00	17%	354,769.00	5%
Latif Gashi	n/a	474,300.00	n/a	484,176.00	2%	420,140.00	-13%
Kurtan Kajtazi	n/a	422,900.00	n/a	512,501.00	21%	451,531.00	-12%
Halit Krasniqi	n/a	1,710,000.00	n/a	1,374,057.32	-20%	478,545.45	-65%
Democratic League of Kosovo (LDK)	Total Wealth	Total Wealth	Difference from previous year	Total Wealth	Difference from previous year	Total Wealth	Difference from previous year
Hashim Deshishku	n/a	13,120,090.00	n/a	13,390,524.75	2%	12,822,255.00	-4%
Ismet Beqiri	271,084.71	269,565.00	-1%	282,402.00	5%	301,244.00	7%
Naser Osmani	83,000.00	122,000.00	47%	97,240.00	-20%	86,800.00	-11%
Lutfi Haziri	498,730.35	1,784,700.00	258%	1,846,414.00	3%	1,931,243.00	5%
Skender Hyseni	652,646.25	656,438.00	1%	648,382.60	-1%	642,381.52	-1%
Arben Gashi	n/a	236,094.00	n/a	299,845.00	27%	265,270.00	-12%
Lutfi Zharku	362,794.39	365,202.80	1%	380,941.00	4%	505,129.00	33%
Vjosa Osmani	n/a	84,351.00	n/a	192,096.00	128%	1,252,311.00	552%
Bahri Thaçi	n/a	447,300.00	n/a	465,800.00	4%	562,603.00	21%
Teuta Sahatqija	n/a	867,472.32	n/a	884,277.39	2%	898,787.39	2%
Ali Sadriu	n/a	671,200.00	n/a	689,720.00	3%	694,520.00	1%
Sadri Ferati	711,552.00	776,770.00	9%	812,199.00	5%	744,169.00	-8%
Salih Morina	n/a	328,095.00	n/a	329,400.00	0%	331,136.00	1%
Alliance for the Future of Kosovo (AAK)	Total Wealth	Total Wealth	Difference from previous year	Total Wealth	Difference from previous year	Total Wealth	Difference from previous year
Ramiz Kelmendi	n/a	91,308,453.31	n/a	78,283,763.31	-14%	50,268,837.39	-36%
Daut Haradinaj	n/a	376,557.02	n/a	205,993.19	-45%	354,315.00	72%
Blerim Shala	n/a	347,981.00	n/a	354,715.00	2%	361,216.00	2%
Ardian Gjini	486,576.00	496,376.00	2%	505,976.00	2%	515,076.00	2%
Burim Ramadani	n/a	820,300.00	n/a	1,008,900.00	23%	1,004,500.00	0%
Bali Muharremaj	n/a	615,400.00	n/a	589,404.15	-4%	589,404.15	0%
Self-Determination Movement (VV)	Total Wealth	Total Wealth	Difference from previous year	Total Wealth	Difference from previous year	Total Wealth	Difference from previous year
Florin Krasniqi	n/a	10,306,136.00	n/a	11,421,521.00	11%	6,896,116.00	-40%
Rexhep Selimi	n/a	235,906.00	n/a	196,156.00	-17%	196,156.00	0%
Albin Kurti	n/a	19,240.00	n/a	19,240.00	0%	19,240.00	0%
Albana Gashi	n/a	342,856.00	n/a	343,000.00	0%	342,856.00	0%
Afrim Hoti	n/a	305,856.00	n/a	305,856.00	0%	305,656.00	0%