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Statute of limitations in Albanian criminal law: Balancing national legislation and international standards

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Abstract

International agreements are important in strengthening the rule of law and all the norms that regulate the internal system. An important role is also played in the criminal norms that regulate the statute of limitations in criminal law. This article will analyze the legal provisions of international agreements and their implementation in domestic legislation. This analysis will serve to understand if their content complies with the internal legislation, the obligations that must be respected and which are the cases that are left to the discretion of the party states. The statute of limitations, according to the conventions, varies according to the criminal offenses and precisely in each of them a distinction is made according to the type and importance of the criminal offences. The Albanian penal code has a clear necessity to change and expand the statute of limitations, through a legal reform. This need arises to harmonize domestic legislation with foreign legislation and to facilitate the implementation of the law in matters that are mainly related to international cooperation. The integration of Albania into the EU requires the adaptation of its standards and leaves Albania with a series of obligations to improve and change the internal legislation, so it is more important to determine who are the appropriate legislators' interventions, including the institute of prescription.

Keywords: prescription, conventions, internal criminal law, judicial practice.

1. Introduction

The statute of limitations in Albanian criminal law is provided in two forms: the statute of limitations for criminal prosecution and the statute of limitations for the execution of a criminal sentence. The criminal law has provided for the statute of limitations for a number of reasons, which will be dealt with in the future, making a fair approach and with the international agreements ratified by the Albanian state. One of the main reasons that the criminal law has provided for the statute of limitations is also related to the lack of public interest to continue the prosecution of the perpetrator of the criminal offense or the execution of the sentence, since with the passing of the proportional legal terms, it is assumed that the perpetrator of the criminal offense has been educated. However, there is also an absolute criterion, for which serious crimes such as war crimes and crimes against humanity are not prescribed. The legislations of different countries, in principle, have given legal value to those circumstances, the proof of which leads to the non-exercise of criminal prosecution or the non-execution of the sentence and why we are actually facing a committed criminal act. Completing the statute of limitations is a non-random legal regulation in criminal law, but their existence is justified in relation to the functions they fulfill and the goals they pursue. "The reasons that justify the existence of these institutes in criminal law are of a criminal-political and practical nature"

The institution of the prescription of the criminal offense, based on the criminal doctrine, is based on the so-called principle of the economy of the judicial system, as well as on the requirement to guarantee the defendant an effective defense right. With regard to the first, in fact the passage of time often diminishes the state's interest in prosecuting certain criminal offenses, for which there is less need for criminal defense in implementation of the re-educational purpose of criminal punishment. The principle of an orderly legal process, provided for by Article 42 of the Constitution and Article 6 of the ECHR, also takes into account the not excessive duration of the process, and in this sense, the statute of limitations represents the instrument to avoid being abused in connection with the criminal prosecution by the judicial system.

Consequently, the main reasons justifying the provision of a general institution such as prescription are related to the fact that the passage of time on the one hand reduces social alarm or public interest. for the punishment of the author of the criminal offense and on the other hand it makes it more difficult to exercise the right of defense, and this also due to the delay in the development of the process, administration of evidence, etc. These institutes of criminal law are public in nature and are in the general interest. They should not only be seen as legal categories but also as social categories to resolve the possible internal conflict between the criminal-legal norm and its real, social content, functions and goals. "The reason for the existence of the statute of limitations in criminal law should be sought in fact in an assessment of a general character derived from the understanding of the absence or reduction of the "need of punishment", based essentially on the non-acceptance of the theory of the absolute punishment of punishment".

If we refer to the opinion that the perpetrator of the criminal offense should be punished for the offense committed, with the aim of preventing him so that he does not commit other criminal offenses in the future, the fact that he has been living under psychological pressure all this time, that he will be punished for the criminal offense committed, it is a kind of punishment for him. With the passage of a long time since the commission of the criminal offense, the latter is forgotten by society. The exercise of criminal prosecution in the event that it has not been initiated, or the execution of a given sentence if it has not been executed, would not have any general preventive effect, would not exert any positive influence on the social environment, to did he educate the latter with a sense of respect for the laws. "The goal of the legislator in establishing this time limit and prohibition was, firstly, the realization in practice of the general and special preventive effect of punishment in each specific case and secondly, the discipline of the process of execution of punishment decisions in general".

The Constitutional Court and the Supreme Court have expressed several times their position regarding this institute, referring in their reasoning to the position of the ECtHR and of course to the agreements ratified by the Albanian state.

This paper will analyze the approach of the legal provision of domestic legislation with international agreements, to clearly understand what are the legal vacuums of domestic legislation. But also, the implementation of the statute of limitations in Albanian criminal law raises a series of problems. They are related not only to the procrastination of criminal cases, unclear norms that lead to subjective interpretations, but also to non-proportional and appropriate deadlines for criminal offenses such as corruption, organized crime, which necessarily require the need for reform of the institute. This need arises not only to be in harmony with the content of international documents, but also to ensure that such crimes do not go unpunished.

The research of this paper will analyze issues such as: what are the main challenges of the Albanian legislator to the prescription and its reformulation, how is the Albanian state following the implementation of this institute in comparison with international agreements and European standards, what reforms should be undertaken in such a way that to respect the purpose of implementing the statute of limitations, to balance the justice system, legal clarity and without equivocation.

This paper aims to analyze the process of criminal prosecution and execution of criminal decisions in Albania within the framework of international agreements ratified by the Albanian state. Starting from domestic and international legislation, the paper will examine the steps and procedures for criminal prosecution, as well as the process of execution of criminal decisions in practice. In this context, the research is of fundamental importance to understand how the criminal decision and the Albanian criminal justice system affect compliance with international standards, and how they can be improved to ensure greater compliance and effectiveness in the implementation of criminal justice.

2. Statute of Limitations in Albania

Albanian criminal law provides for the statute of limitations for criminal prosecution (Article 66 of the Criminal Code) and the statute of limitations for the execution of the sentence (Article 68 of the Criminal Code). These two provisions, which we have analyzed in other scientific works, have a similar structure, where it is based on the passing of certain deadlines and measures of penalties provided by the criminal code and penalties given by the court. Article 67 of the Penal Code has provided an absolute penalty for the application of the statute of limitations in serious criminal offenses such as war crimes and crimes against humanity.

These provisions must be changed and reconciled with international standards, since

based on the criteria of its implementation, it results that the time limits, with the passage of which lead to the extinguishment of the criminal offense and the punishment are not proportional, leave reason for subjective abuse in the implementation of them, do not provide for the suspension or interruption of the statute of limitations, they violate impunity for criminal offenses, which are serious and widespread in Albania.
The legislative changes of 2017 have also affected the statute of limitations. Specifically, the deadlines related to the statute of limitations for criminal prosecution provided by Article 66 of the Criminal Code, last paragraph, have been changed. These changes aim to ensure that persons who commit criminal offenses with significant social risk, which foresee a life imprisonment sentence, do not escape criminal prosecution.
The statute of limitations for criminal prosecution does not apply to the criminal offenses of the Section in Articles 76-79c, which are specifically the criminal offenses of intentional murder, intentional murder in connection with another crime, premeditated murder, murder for blood feud, murder in other qualifying circumstances, murder of public officials, murder of State Police employees and murder due to family relationships. For all these criminal offenses, the time limit for criminal prosecution has been removed.
In contrast to the legal provisions of the previous Criminal Code, with the law no. 36/2017 "On some additions and changes in the law no. 7895, dated 27.1.1995, "Criminal Code of the Republic of Albania", as amended", the legal terms for crimes punishable by life imprisonment have been doubled from 20 years as provided for in the old code to 40 years. Such a change has been made in the context of intensifying the fight against crimes, criminal offenses which have a significant social danger.
These changes provide that criminal prosecution cannot be carried out when forty years have passed from the commission of the criminal offense to the time the person is charged as a defendant in the case of crimes punishable by life imprisonment and twenty years for crimes that can be are sentenced to more than ten years of imprisonment. A 10-year term is provided to extinguish the criminal prosecution for crimes that foresee a penalty of five to ten years of imprisonment.
Prescription of the execution of the sentence extinguishes the sentence, in the sense that it makes it unenforceable. The execution of the sentence is related to the time limits specified in the law, the passage of which causes the loss of the right of the competent body to execute the sentence given against the perpetrator of the criminal offense. Given that the punishment measures are different for the perpetrators of different, the legislator foresees the terms of their prescription based on the measure of punishment, these terms are defined in article 68 of the Criminal Code[1].
The statute of limitations for the execution of a criminal sentence like any other case of statute of limitations, contains two elements (Hoxha, Kacupi, Haxhia, 2019): a)

[1] Article 68 of the Criminal Code provides: The sentence decision is not executed when: a) twenty years have passed since the day it became final: a) twenty years for the decision containing the sentence of fifteen to twenty-five years of imprisonment; b) ten years for the decision containing five to fifteen years of imprisonment; c) five years for decisions containing a prison sentence of up to five years or other lighter penalties.

failure of the state to realize a right and fulfill an obligation (execution of the criminal sentence decision); b) the time limit after which the execution body can no longer carry out execution actions. So, for the prescription of the execution of the decision, three types of deadlines are provided, respectively; twenty, ten and five years.

3. International conventions and standards that Albania must fulfill

Albania is part of many international agreements including (ECHR), International Convention against Corruption (UNCAC), European Agreement on Extradition (EAW), Convention against Trafficking in Human Beings (Palermo) etc.
European Convention on Human Rights (ECHR) protects fundamental human rights across its member states. While the ECHR does not directly regulate statutes of limitations, its principles significantly influence how limitation periods are applied in national legal systems. This relationship between the ECHR and statutes of limitations, focus on the balance between legal certainty, individual rights, and accountability for serious crimes[2]. Statutes of limitations contribute to legal certainty, a core principle under the ECHR. This principle ensures that individuals are not subjected to indefinite legal uncertainty regarding potential criminal charges. Article 6 of the ECHR guarantees the right to a fair trial, which includes reasonable time limits for legal proceedings.
Preventing indefinite prosecution means limitation periods to protect individuals from being prosecuted for alleged offenses after an unreasonable time has elapsed. Promoting timely investigations, obligates the states to conduct prompt and effective investigations, ensuring that cases do not expire due to procedural delays. In cases involving serious human rights violations, such as genocide, torture, and enforced disappearances, statutes of limitations may conflict with the ECHR's principles of justice and accountability[3]. Albanian Criminal Code, as an ECHR member, has adopted laws ensuring that crimes such as genocide and crimes against humanity are not subject to statutes of limitations, aligning with international standards.
The International Convention against Corruption (UNCAC) is a United Nations convention which aims to promote and protect the integrity of criminal justice and fight corruption at all levels. Albania is one of the ratified countries of this convention and is responsible for implementing UNCAC standards in its legal system.
Article 29 of the UNCAC specifically analyzes statutes limitations for corruption related offenses. Article 29 of the UNCAC specifically addresses statutes of limitations for corruption-related offenses. It urges states to: a) establish long Limitation Periods and member states must ensure that limitation periods for initiating legal proceedings

[2] Legal Certainty and the Right to a Fair Trial (Article 6 ECHR). Convention Principles: The ECtHR has ruled those serious violations of Articles 2 (right to life) and 3 (prohibition of torture) require effective investigations and prosecutions, regardless of statutory limitations.
[3] The European Court of Human Rights (ECtHR) has consistently emphasized the importance of combating impunity for grave offenses. Analyzing Šilih v. Slovenia (2009): The Court stated that statutes of limitations should not hinder the state's obligation to ensure accountability for human rights violations.

are sufficiently long to allow effective investigation and prosecution; b) consider Suspension or extension. In cases where the accused has evaded justice, the statute of limitations should either be suspended or extended to ensure accountability. This is a recommendation that the Albanian legislation must adapt as soon as possible because these provisions aim to ensure that legal frameworks do not inadvertently enable impunity for corruption. Efforts must include extending limitation periods for severe corruption offenses and improving investigative efficiency. Complex corruption cases within public institutions can delay investigations, allowing limitation periods to expire. Inefficiencies in the judicial system contribute to prolonged legal processes, undermining the ability to prosecute cases within prescribed timeframes. On line with this convention, Albania must extend Limitation Periods for Corruption Offenses, establish longer or indefinite limitation periods for high-profile and large-scale corruption cases, ensure that the time limits reflect the complexity of investigating such crimes, suspend or interrupt Limitation Periods.

The European Convention on Extradition (EAW) is an instrument of the European Union for the extradition of persons convicted or suspected of criminal offenses between member states. It aims to facilitate extradition procedures and strengthen judicial cooperation in the EU.

The ECE outlines in article 10 that extradition shall not be granted if, under the laws of the requesting or requested states, the offense is time-barred dur to the statute limitations. The applicable statute of limitations is determined by the domestic laws of either the requesting or the requested state, depending on the circumstances. This article underlines the importance of the statutes of limitations of each nation, including Albania, to respect legal certainty and fairness. In the other hand, extradition may be denied if the requested state applies shorter limitation periods than the requesting state, allowing offenders to evade accountability. This convention holds a crucial role in fostering international cooperation in criminal matters because statute limitations remain a significant obstacle to extradition.

In conclusion, the European Convention on Extradition is an effective tool to facilitate international cooperation in the field of criminal justice. By defining clear procedures and extradition standards, as well as by promoting close cooperation between member countries, the EEC provides a powerful tool for the fight against organized crime and for strengthening the rule of law at the international level. For Albania, the full implementation of the EEC is a critical step towards strengthening the criminal justice system and ensuring compliance with international criminal justice standards.

The Rome Statute[4] explicitly excludes statutes of limitations for the crimes under its jurisdiction. Article 29 of the Statute states: "The crimes within the jurisdiction of the Court shall not be subject to any statute of limitations." The exclusion of statutes of

[4] This provision applies to:1. Genocide: Acts committed with intent to destroy a national, ethnic, racial, or religious group. 2. Crimes Against Humanity: Widespread or systematic attacks against civilians, including murder, enslavement, torture, and persecution. 3. War Crimes: Serious violations of the laws of war, such as targeting civilians or using prohibited weapons. 4. The Crime of Aggression: The planning, preparation, initiation, or execution of acts of aggression by a state leader.

limitations in the Rome Statute[5] reflects the unique nature of the crimes it addresses:1. Grave Nature of the Crimes that are considered so severe that they warrant prosecution regardless of the passage of time. They are crimes against humanity itself, undermining the moral and legal fabric of the international community.2. Perpetrators of international crimes often evade justice due to political instability, conflicts, or state complicity. The absence of time limits ensures that justice can be pursued even after regimes change or evidence becomes available. Regarding the typology of crimes that this court has in its jurisdiction, Albanian Criminal code must incorporate the definitions of war crimes, the crime of aggression to be on line with convention.

An important step is the United Nations Convention against Transnational Organized Crime (UNTOC, 2000). Statutes of Limitations Under UNTOC. Article 11(5) of UNTOC addresses statutes of limitations, urging states to adopt sufficient timeframes for prosecuting serious transnational crimes. It emphasizes: a) States should establish long or flexible statutes of limitations to ensure effective prosecution of complex organized crime cases. b) Limitation periods should be suspended when an offender evades justice or absconds. The rationale behind these provisions is that organized crime cases often involve intricate networks, cross-border investigations, and significant delays, requiring legal frameworks that prevent perpetrators from escaping accountability.

Albania's Criminal Code and related laws regulate statutes of limitations based on the severity of the offense. Since ratifying UNTOC, Albania has taken steps to align its legal framework with the Convention's requirements. Specific offenses linked to organized crime, such as human trafficking, drug trafficking, and money laundering, are considered grave crimes, often with longer limitation periods. Albanian criminal law does not allow the suspension of limitation periods if the perpetrator evades prosecution, not aligning with UNTOC's recommendations. Enhancements Post-UNTOC Ratification

An important step taken is regarding the Law No. 9284 (2004) on the Prevention and Fight Against Organized Crime strengthened the legal framework by introducing harsher penalties and improving investigative procedures, indirectly influencing statutes of limitations for such crime. To further align with UNTOC's principles and ensure effective use of statutes of limitations in combating transnational organized crime, regarding the prescription, the Criminal code must extend or Eliminate Limitation Periods for Organized Crime, excluding transnational organized crime from statutes of limitations, as done for serious offenses like genocide and crimes against humanity.

Albania's ratification of the UNTOC signifies its commitment to combating transnational organized crime, including aligning its statutes of limitations with international standards. By extending limitation periods, enhancing judicial capacity,

[5] Albania become a party to the Rome Statute of the International Court on 31.01.2003. By the ratification Albania do not apply statute limitations for genocide, crimes against humanity, war crimes and the crime of aggression.

and fostering international cooperation, Albania can further strengthen its alignment with UNTOC and uphold its commitment to justice and accountability.
OECD Anti Bribery Convention (1997) encourages states to establish limitation periods that allow sufficient time for effective prosecution, even though Albania is not e part of it.

4. Cases from Albanian practice and international courts

After analyzing the international documents and their legal provisions and in relation to the Albanian criminal law, it is appropriate to analyze some decisions of the ECtHR and the Court of Justice of the EU.
Of importance is the Taricco decision of the Court of Justice of the European Union, a case which, with the decision dated 09.8.2015, was expressed in relation to the violation of the terms of the provisions of the Italian Criminal Code and the law of the European Union.
The Taricco case (also known as C-105/14, Taricco and Others) is a landmark ruling by the Court of Justice of the European Union (CJEU), which dealt with the issue of statutes of limitations in the context of serious criminal offenses, particularly in relation to fraud and EU law. The case raised significant questions about the balance between national legal systems and EU law concerning the enforcement of penalties for serious crimes, and the potential conflict between EU law principles and national statutory limitations.
The core issue in the Taricco case was whether the EU principle of effectiveness (which requires EU laws to be applied effectively by national courts) would override the Italian statute of limitations for serious criminal offenses like VAT fraud. The Italian court referred the case to the CJEU for a preliminary ruling to clarify whether EU law mandates those national legal systems must remove or extend the statute of limitations for serious crimes such as VAT fraud. CJEU ruled that the Italian statute of limitations for VAT fraud was not in line with EU law because it could prevent the effective enforcement of EU tax laws and undermine the principle of effective sanctioning of serious criminal offenses. National laws (like Italy's statute of limitations) should be interpreted in a manner that does not undermine the effectiveness of EU law, particularly in ensuring that serious criminal conduct is prosecuted and punished (Marinucci, Dolcini, Gatta, 2023). The Taricco ruling highlighted the tension between national sovereignty in criminal law (such as the application of statutes of limitations) and the broader goals of EU law, which seeks to harmonize legal standards across member states. The decision led to discussions about the flexibility of national laws in aligning with EU principles, especially when it comes to ensuring the prosecution of serious offenses and respecting fundamental rights like the right to a fair trial. In response to the Taricco ruling, Italian courts initially had difficulty reconciling national law with the CJEU's decision. However, following Italian constitutional review, the Italian Constitutional Court ruled in 2015 that EU law does not require the abolition of the statute of limitations but rather that national laws must be applied in a manner consistent with the EU principle of effectiveness. This interpretation allowed for some

flexibility in balancing national legal traditions and EU law requirements.

The Taricco case is significant for its role in shaping the relationship between EU law and national criminal law, particularly regarding the application of statutes of limitations for serious criminal offenses. The case confirmed that EU law's effectiveness and the goal of deterring cross-border fraud outweigh national limitations in certain cases, providing a precedent for future cases where serious criminal offenses are involved. However, it also emphasized the delicate balance between respecting national legal systems and ensuring that EU law achieves its objectives in promoting justice and deterrence. In this way the Italian Constitutional Court with the sentence nr. 115/2018 has finally decided that the articles 160,161 of Italian Criminal Law shall apply in order to respect the principle of legality.

The Varnava and Others v. Turkey case is a significant ruling by the European Court of Human Rights (ECHR), addressing the issue of enforced disappearances and the state's obligation to investigate such violations under the European Convention on Human Rights. The case concerns the enforced disappearances of individuals in the context of the Cyprus conflict in the 1970s.The core issues on this case deal even with Statute of Limitations and Continuing Violations, whether the passage of time affected the investigation, and whether Turkey's failure to investigate constituted a continuing violation of human rights. In 2009, the European Court of Human Rights ruled in favor of the applicants, finding that Turkey had violated multiple provisions of the European Convention on Human Rights, especially Article 2 (right to life) and Article 13 (right to an effective remedy).

The Court found that "*Turkey had failed to conduct an effective investigation into the disappearances of Greek Cypriots, violating the right to life under Article 2. The Court emphasized that the state's obligation to investigate is not limited by the passage of time and that the disappearances amounted to continuing violations of the Convention*". The Court stated that Turkey's failure to provide any substantial answers regarding the fate of the missing individuals violated the principle of an effective remedy under Article 13, as the applicants had no recourse to justice within Turkey to clarify the fate of their loved ones. The Court reinforced the view that enforced disappearances are continuing violations. This means that the statute of limitations does not apply to cases of enforced disappearance, as the violation continues as long as the victim's fate remains unresolved.

Janowiec and others v. Russia (2013)[6] is another important case of the court. The case raised several important questions under the European Convention on Human Rights as the Statute of Limitations was taken in consideration. The point as to do whether

[6] The case concerned the families of Polish nationals who were victims of the Katyn massacre during World War II. In 1940, over 22,000 Polish military officers, police officers, and intellectuals were executed by the Soviet Union's secret police, the NKVD (People's Commissariat for Internal Affairs), and buried in mass graves in the Katyn Forest and other locations. In 2011, the applicants, who were relatives of the victims, brought a case against Russia after alleging that Russia failed to investigate the killings and provide adequate remedies for their families. They claimed that Russia's failure to open an effective investigation into the killings violated their right to an effective remedy (Article 13 of the European Convention on Human Rights), the right to life (Article 2), and the prohibition of torture and inhuman or degrading treatment (Article 3).

Russia could invoke statutes of limitations to avoid investigating events that happened more than 60 years ago. The Court stated that Russia could not rely on a statute of limitations to avoid investigating crimes that were so serious, especially in the context of enforced disappearances, which do not fall within ordinary legal limitations. It noted that the continuing nature of the violation (as the whereabouts of the victims' remains were unknown) meant that the statute of limitations did not apply.

The ruling emphasized that international human rights law does not allow states to use national statutes of limitations to avoid investigating severe crimes like extrajudicial executions or enforced disappearances. The Janowiec v. Russia case is a landmark ruling that underscores the continuing violation principle, especially regarding enforced disappearances and serious crimes under international law. The Court reinforced that states cannot avoid investigating grave human rights violations, even if decades have passed, and that statutes of limitations do not apply to such violations under international human rights law. This case serves as an important precedent for holding states accountable for historical injustices and protecting the rights of victims and their families to seek truth and justice.

Decision no. 42 dated 29.05.2024 of the Constitutional Court regards the principle of legal certainty, retroactive power of the criminal law and the statute of limitations. Law no. 36/2017, as regards the amendment of Article 66 of the Criminal Code, does not provide for its application to offenses whose criminal prosecution at the time of its entry into force was prescribed, which could call into question the observance of the principle of the rule of law in terms of legal certainty and that of equality before the law. Even in decision no. 6 dated 16.02.2021 of the Constitutional Court, the same position is maintained even though we are dealing with the connection between the institute of extradition and that of prescription. So, what will be taken into consideration is that the completion of the statute of limitations was completed before the entry into force of the changes with law no. 36/2017.

5. Recommendations

The provisions on the prescription should be reformulated and changed by adapting to the provisions of the countries of the contemporary codes but also by categorizing criminal offenses which are very widespread and have a high social risk. These provisions must be changed and reconciled with international standards, since based on the criteria of its implementation, it results that the time limits, with the passage of which lead to the extinguishment of the criminal offense and the punishment are not proportional, leave reason for subjective abuse in the implementation of them, do not provide for the suspension or interruption of the statute of limitations, they violate impunity for criminal offenses, which are serious and widespread in Albania.

The legislative changes of 2017 have also affected the statute of limitations. for criminal prosecution does not apply to the criminal offenses of the Section in Articles 76-79c, which are specifically the criminal offenses of intentional murder, intentional murder in connection with another crime, premeditated murder, murder for blood feud, murder in other qualifying circumstances, murder of public officials, murder of

State Police employees and murder due to family relationships. For all these criminal offenses, the time limit for criminal prosecution has been removed. The legislator must make the same provision for this category of crimes not only for article 66 of Criminal Code but even for the article 68, because this can violate the principle of equality. Article 6 of the ECHR guarantees the right to a fair trial, which includes reasonable time limits for legal proceedings, the courts states that preventing indefinite prosecution means limitation periods to protect individuals from being prosecuted for alleged offenses after an unreasonable time has elapsed.

The Taricco case is significant for its role in shaping the relationship between EU law and national criminal law, particularly regarding the application of statutes of limitations for serious criminal offenses. The case confirmed that EU law's effectiveness and the goal of deterring cross-border fraud outweigh national limitations in certain cases, providing a precedent for future cases where serious criminal offenses are involved. The Albanian Criminal Code must foresee longer time limits for serios crime as corruption, organized crime, money laundering.

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