



This journal provides immediate open access to its content under the [Creative Commons BY 4.0 license](https://creativecommons.org/licenses/by/4.0/). Authors who publish with this journal retain all copyrights and agree to the terms of the above-mentioned CC BY 4.0 license

DOI: 10.2478/seeur-2020-0017

EXTRADITION IN THE LIGHT OF LEGAL SOLUTIONS IN THE REPUBLIC OF KOSOVO - EXPERIENCES, CHALLENGES

PhD. Candidate Arsim Thaçi
Faculty of Law,
South East European University, Tetovo, North Macedonia
at29084@seeu.edu.mk

Prof. Dr. Ismail Zejneli
Faculty of Law,
South East European University, Tetovo, North Macedonia
i.zejnели@seeu.edu.mk

ABSTRACT

Beheld in terms of international law, its subjects such as states, governments or international organizations always communicate with each other based on the spirit of the provisions of the field of international law.

In the framework of the breaches, respectively the deliberate violation of these provisions, is the case of the so-called "Gulenists", where all the links of the system under which the extradition matter is built upon, are exempted.

Our country will keep this stain for a long time, while in the archives of justice it will be treated as a case that should not have happened, always based on the commitment to the strict implementation of the provisions of the field of international law that our state has always had. At least they should have been held accountable, even criminally; hence, such cases to have never been repeated in our country.

The lack of criminal accountability of the actors-senior state officials directly implicated in this case has left scars in our system, which at that moment is widely considered as a delayed system, while at an instant the whole commitment in this direction is shaken.

This stain could have been avoided post festum - even in the circumstances when it happened, that is, even in the situation when all the political actors had been implicated in this case.

In this regard, whilst analyzing the provisions we can assume that despite the deficiencies and continuously looking at the volume of legal provisions of this law, yet, we can consider that our system in this area has advanced and has ongoing initiatives to improve this system to the extent that could meet the requirements in relation to the dynamics of social and international relations.

Key words: Extradition, Experiences, Challenges.

INTRODUCTION

One of the challenges in our legal system in terms of accurately considering condensing the provisions of international criminal character, is the issue of extradition.

In relation to this matter, the issue of legal sources on the extradition procedure is raised, sources which change the course of the procedure related to extradition.

The framework of these bilateral or multilateral communications is also the communication regarding the extradition of the person wanted by the other country who is in his own country or in a third country.

Following this, it derives the issue of extradition, in general.

In the framework of the systemic changes that our country has made following the steps towards the provisions of international law, the extradition procedure was one of the main modification requirements of the legal system development.

Despite the fact that our country has endorsed and approved the Law on International Legal Cooperation in 2013, nonetheless in its content seen at the first review (an editor's part of job, the world knows that putting 'review' instead of review is a technical spelling mistake), it seems limited, hitherto it is expected that, in general, all situations and procedural actions are

included as well as all the rights of the person to whom the extradition is requested, our country shall have implemented all the obligations deriving from the extradition procedures

Our country has strictly implemented all the extradition procedures, from the moment of issuing the law as a source from which the course of the procedure is perceived, our country has strictly implemented these provisions. For a period of time, there was an impression that we are dealing with an advanced country in respecting the provisions of law until the moment when these provisions, at one point, were harshly violated by political actors, as well as the court itself as an institution that had to take care of the strict implementation of these provisions.

Notwithstanding the fact that our criminal law prohibits the extradition of Kosovar citizens, though, bilateral agreements on extradition that our country has concluded with other countries, which actually standardize this matter, in the field of extradition emerge as high sources of law.

In relation to securing the rights of the person to whom extradition is requested as a vanguard, they abide by international conventions on human rights, as well as the law on international legal cooperation, which essentially protect the rights and freedoms of the person as subject to extradition.

To what extent we approach this issue is related to other determining factors, which directly or indirectly affect these efforts for this extradition procedure to be accurately implemented by applying each provision separately, on the one hand, taking care and functioning in the spirit of the legal provision and on the other hand ensuring the protection of the rights in the procedure, as well as the rights and freedoms of the person who is the subject to extradition.

The challenges are excessive, but also the commitment is great, while other factors in the chain of factors that affect the improvement of the whole system in relation to the extradition procedure, are accompanied by problems that derive from the level or degree of development of democracy, the level of social and political relations, the level of awareness, political and legal culture of all actors, etc.

In these circumstances, the increase in the level of development of the aforementioned factors assumes a commitment, a better approach, towards the profile of the extradition procedure, which as a society we persistently insist on.

OVER THE NOTION OF EXTRADITION IN GENERAL

The issue of extradition is among the reports of criminal-legal character which is created between countries according to a legal source.

In a broader sense, the notion of extradition can be deduced from the very origin of the word extradition, which is derived from the two Latin words "ex" and "traditio", which in a broader sense will mean ex-outside and traditio-deliver.

Additionally, the following implies the extradition of a person outside the country where he/she was initially apprehended, to a third country at the demand of the requesting country (Robert, 2007, pp. 79-88).

Due to the circumstance that a certain criminal offense, from a certain perpetrator, can be committed in one state, while for certain reasons, the perpetrator can flee to another state, there is a need for his/her extradition to the requesting country where the offence was committed, in order to conduct the all criminal proceedings or for the final decision to be executed.

The principle of legality (*nullum crime sine lege*) requires that criminal behavior be defined as clearly as possible in the definition of crime (Gerhard, 2014, pp. 39-41).

According to the legal definition, extradition would mean the extradition of a person (defendant or convicted) from one country to another at the request of the authority of the demanding country to the country in which that person is located (Salihu, 2011, pp. 154-155).

Due to these circumstances, each country has concluded international agreements signed between them, be they bilateral or multilateral, which have to do with the extradition procedure of the requested persons in accordance with these agreements (Salihu, 2015, pp. 171-172).

In reference of the issue being discussed hereinto, the Republic of Kosovo has already endorsed the extradition procedure by incorporating it in the law on international legal cooperation for criminal issues and the bilateral agreements that regulate this matter (Law no. 04/L-213, 2013).

TYPES OF EXTRADITION

Depending on the legal systems, applied by certain countries and considering the extradition procedures; which countries dealing with the extradition procedure, two systems are distinguished, the administrative system and the mixed system of extradition (Salihu, 2011, p. 184).

- 1.1. The administrative system is applied in fewer countries of the world, because it means a simpler procedure from the circumstances that the extradition procedure is performed by the administrative bodies of the respective country and that the final act on concluding the extradition procedure is simply an administrative act on permitting execution.
- 1.2. In the mixed system, the extradition procedure is a double administrative-judicial procedure, which means that the administrative actions are undertaken by the administrative bodies, while the final decision on the extradition permit is taken by the judicial body of the district court in the territory where the wanted person is apprehended.

As an exemplification, our country represents the second extradition system, which in itself implies a series of actions of a broad administrative-judicial character with the issuance of the final decision on extradition (Salihu, 2011, p. 185).

In the Republic of Kosovo, the issues of the extradition procedure are sanctioned by the Law on International Legal Cooperation in Criminal Matters, while international law regulates the segment of that extradition procedure which in whole or in large part refers to the inclusion of both or more countries in this procedure, such as: temporary deprivation of liberty of the defendant; the case of competing claims of many countries; the issue of transit; delivery of items which have been taken by the defendant and extradition costs (Salihu, 2011, p. 186).

LEGAL RESOURCES RELATED TO EXTRADITION

The extradition procedure relies on legal sources, which are numerous, while the basic source of law that regulates in detail this procedure in its completeness is the Law on International Legal Cooperation (Low no. 04/L-213, 2013).

The Institute of Extradition in the Republic of Kosovo, initially was stipulated by the Code of Criminal Procedure that was in force from April 6, 2004, providing a whole chapter, which defines the conditions and procedures that must be met in order for the perpetrator of the criminal offense to be extradited (Chapter XLVIII, Articles 516-532). Then, the Institute of Extradition is regulated by a special law, the Law on International Legal Cooperation in Criminal Matters, which entered into force on 16.09.2011, which was amended and supplemented on 02.09.2013. However, with the amendments and supplements to the Criminal Procedure Code of the Republic of Kosovo on January 1, 2013, it does not foresee extradition. In the Republic of Kosovo, the institute of extradition is regulated by constitutional provisions, by bilateral agreements, but is regulated in detail by the norms of the Law on International Legal Cooperation in Criminal Matters.

In addition to the above-mentioned law as the main source, in association with the extradition procedure are also applied secondary or accompanying sources of law such as: Bilateral extradition agreements (USA, Republic of Albania), International conventions on extradition, and International conventions on human rights, the Criminal Code of the Republic of Kosovo, the Constitution of the Republic of Kosovo, as well as other sources of law in the field of international criminal law.

The attitude that only the law can define crime and punishment (*nullum crimen, nulla poena sine lege*) and prohibits the extension of the application of criminal law *malum partem* by analogy, confirms the Article 7 (1) of the European Convention on Human Rights (Gudmundur, 1999, pp. 247-250).

Nobody might be deprived of his freedom on the ground that he/she is unable to fulfill a contractual obligation (KEDNJ, 2010).

At the time the crime was committed, there must have been a written or unwritten norm on which to base criminality under international law (The Rome Statute of the International Criminal Court, 2002).

Perceived by its volume, there does not seem to be a bulk of legal sources that regulate this matter, nevertheless I consider that despite this fact, their content and their character provides a conglomeration of sufficient sources for adequate access to their implementation with dedication considering their dispositions, spirit and character during their implementation in the concrete case.

EXTRADITION PROCEDURE ACCORDING TO LEGAL PROVISIONS IN KOSOVO

As formerly stated, the main source of extradition law is the Law on International Legal Cooperation in Criminal Matters, issued by our legislature, which regulates in detail the extradition procedure from the act of submitting the request for extradition, extradition by the requesting country, until the issuance of the final decision regarding the extradition by our country.

Within its content, the law has tried to include all advanced legal issues without violating at all the freedoms and rights of the wanted person during all stages of the criminal procedure that

must be applied until the act of extradition itself, constantly by carefully protecting the rights, which also belong to him/her (Law no. 04 / L-213, 2013).

our law assumes conditions that must be met cumulatively to act upon the request for extradition, such as: personal records, the decision of the country authority requesting the extradition, the criminal offense for which it is suspected that he has committed, the evidence on which the grounded suspicion or the final decision is based in cases when we are dealing with the execution of the verdict.

Upon the act of submitting the request for extradition to the prosecution for serious crimes, by the relevant ministry, the prosecutor submits to the district court the request for extradition by attaching to the request the accompanying notes related to the wanted person, the evidences upon which substantiates the grounded suspicion or the final decision.

In the attached to the request for extradition, the prosecutor of the case, in order to confirm the presence of the wanted person in the procedure, proposes the imposition of a large detention measure upon the completion of the extradition procedure.

Consequent to receiving the request, the court ex officio calls a hearing, where it examines all allegations in the request, taking care of the merits of the request and the basic conditions on which that request is based.

CONDITIONS TO ACT ACCORDING TO THE EXTRADITION PROCEDURE

In the circumstances when the conditions for extradition are not met, the court may reject the request for extradition in the following cases (Salihu, 2011, pp. 166-183):

- When dealing with the prescription of the act;
- When the criminal offense for which it is suspected or the decision is final for a criminal offense which according to our criminal code is not considered a criminal offense;
- For political offenses;
- In the circumstances when it comes to prosecution or execution, which was committed before this law enters into force;
- In the circumstances when we are dealing with military criminal offenses;
- In the circumstances when dealing with the execution of the death penalty;
- In the circumstances when the extradition would mean eventual inhuman torture by the requesting state (the so-called military junta in the states of Central and South America, etc.).

If eventually any of the above conditions are not met, it is in the opinion of the court that based on the law, it can rightly reject the request for extradition, and that this decision is further subject to other procedures in its final force, considering all levels of appeal in this case.

The process of the handing over of the person to be extradited is based on Article 14 of the Franco-German Extradition Convention (ETS no. 24, 1960, p. 13).

The procedure for extradition of foreign defendants or convicts is initiated at the request of the foreign country submitted to the Ministry of Justice or through diplomatic channels (Sahiti, E. & Zejneli, I., 2017, pp. 359-364).

The position of the country in cases when the request for extradition is rejected, this issue is not regulated by the provisions of the extradition institute. In such cases, the general principles of international criminal law are expressed. One of these principles is the principle "*aut didere, aut punire*", where as a result other forms of international cooperation can be used, such as criminal prosecution or transfer of criminal prosecution. Then the transfer of the criminal prosecution cannot be announced as a substitute for the extradition of the perpetrator of the criminal offense, because in these cases *the hidden extradition* would be expressed (Salihu, 2011, pp. 198-199).

THE CASE OF THE SO-CALLED "GULENISTS"

On March 29, 2018, six Turkish citizens of "Mehmet Akif" College in the Republic of Kosovo, were secretly abducted. The abduction was organized by the Turkish Secret Police and the Turkish National Intelligence Service (MiT). Kosovo institutions were acquitted on the grounds that the abduction was carried out without their knowledge (Reuters, 2018).

Moreover, reasons were also given as to why Turkey illegally abducted six of its citizens who had a residence permit in the Republic of Kosovo for years.

On one hand, the Turkish government has stated that the abduction was carried out because six of its citizens in Kosovo belonged to the "FETO" Organization, which had a role in the July 15, 2016 coup in Turkey and, among others, belonged to the 'Gülen' Movement (Gülen movement, 2021).

The Gülen movement's name is based after the family name of the moderate Muslim cleric Muhammed Fethullah Gülen from Turkey, who has no power in the decentralized movement

as he lives as an asylum seeker in the United States. The Gülen movement is simply a model of civilization, which is based on these pillars, and in the first place emphasizes the enemies, such as: 1) Ignorance; 2) Poverty; and 3) Conflicts. He tends to fight them through education and science. The movement has about 300 schools in Turkey and over 1,000 others worldwide (Wikipedia, 2021).

According to a simplified recapitulation, the Turkish authorities have requested six Turks suspected of terrorism and the Kosovo authorities have handed them over upon the expiration of their residence permit.

On the other hand, the Kosovo authorities were obliged to implement appropriate legal procedures and initially find out the nature of any allegedly terrorist activity, and classifying someone a terrorist without having enough evidence.

The implementation of the case had to go through Administrative and Judicial Procedures and that every one of the six Turks should have the right of protection, and then even if there were any proven suspicions by the Kosovo Intelligence Agency (KIA), their permit to stay in Kosovo would have been terminated, hence, a special legal procedure would be developed on their possible deportation or extradition following the official request of Turkey.

Instead of legal proceedings, the authorities of the Republic of Kosovo abducted six citizens and handed them over to the Turkish authorities.

Following this case, the Prime Minister of the Republic of Kosovo dismissed two officials, namely the Minister of Internal Affairs and the Director of the Kosovo Intelligence Agency, and called the actions in the case of the arrest of six Turkish citizens completely unacceptable and contrary to the values and principles of the rule of law (ekonomia-ks.com, 2018).

Members of the KIA had the right under the Law on Foreigners (Article 5) to revoke the residence permits of six Turkish citizens, but should not give any explanation in the decision issued to them by the relevant department. According to the same article, point 3, Turkish citizens had the right to appeal to the competent court (Law no. 04/L-219, 2013).

Whether being according to the appeal to the competent court or according to Article 91 of the Law on Foreigners, initiating an administrative dispute, they could stay in Kosovo for another 30 days according to the law on foreigners and then they could leave voluntarily.

However, they were deported in violation of Article 92 of the Law on Foreigners, which in point 1 states that *“The Republic of Kosovo must not deport or return a refugee in any way to the borders of the territories, where his life and freedom will be threatened for reasons of race, religion, nationality, membership in a certain social group or his political beliefs”*.

According to reports by Human Rights Watch (Human Rights Watch, 2017) and Amnesty International (Amnesty Internacional, 2017/18), Turkey is considered a country of political persecution and torture, so the six Turkish citizens should not have surrendered even after all legal proceedings had been completed. However, the authorities of the Republic of Kosovo, regardless of the legal extradition procedure, handed over six Turkish citizens from Kosovo to the Turkish authorities.

Correspondingly, the principles of the Constitution of the Republic of Kosovo have been violated and that in Article 3, which states that *“The country is governed with full respect for the rule of law, through its legislative, executive and judicial institutions”* and that *“Exercise of public authority in the Republic of Kosovo is based on the principles of equality before the law of all individuals and on the full respect of internationally recognized human rights and fundamental freedoms”* (Constitution of the Republic of Kosovo, 2016).

Article 22 of the Constitution of the country, where the European Convention for the Protection of Human Rights and Fundamental Freedoms and its Protocols is directly applied, has been violated, respectively Article 5 of this convention states that *“everyone has the right to liberty and security of person”* and *“That no one will be deprived of this freedom”*, so the six Turks also enjoyed these rights, but they were deprived of their freedom without any legal process.

Six Turkish citizens were excluded from equality before the law, following a political request from another state, also in violation of Article 24 of the Constitution, which states that *“All are equal before the law. Everyone has the right to equal legal protection, without discrimination.”* Therefore, the political demand of the other state was stronger than the principle of equality in the Constitution of the Republic of Kosovo.

The six Turkish citizens also enjoyed constitutional protection in Article 29 of the Constitution of the Republic of Kosovo, which derives directly from the European Convention on Human Rights, as it states *“Anyone deprived of liberty without a court order must be brought before a judge within 48 hours, who decides on his/her detention or release, no later than 48 hours from the moment when the deprived person is brought to court.”*

In addition, in this case, Article 32 of the Constitution of Kosovo was violated, where six Turkish citizens had the right to use *"Legal remedies against judicial and administrative decisions, which violate their rights or interests defined by law."*

According to the Annual Report 2018 no.18 of the Ombudsperson of the Republic of Kosovo considers that *"The authorities of the Republic of Kosovo, by expelling the Turkish citizens, exposed them to a real risk of being subjected to torture, physical ill-treatment and real danger for serious violations of other rights guaranteed by international instruments for the protection of human rights. As a result, the Ombudsperson finds that the competent authorities in the present case have violated: Article 29, paragraph 2, 3 and 4 of the Constitution of the Republic of Kosovo [Right to Liberty and Security], Article 31 [Right to Fair and Impartial Trial], Article 32 [Right to Legal Remedies] Article 14, Paragraph 1, Article 15, Article 16, Paragraph 1 and 2, Article 17, Paragraphs 2 and 6 of Law no. 04/L-2013 Articles 8 and 10 of the Universal Declaration of Human Rights, Article 9, paragraphs 1 and 2, Article 13 of the International Covenant on Civil and Political Rights, Articles 5, 6 and 3 of the European Convention on Human Rights and Fundamental Freedoms, Article 1, paragraph 1 of Protocol no. 7 of the European Convention on Human Rights and Fundamental Freedoms, Article 3, paragraph 1 and paragraph 2 of the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment"* (Ombudsperson Institution, 2018, p. 226).

EXECUTION OF THE DECISION ON EXTRADITION

In other circumstances, when the conditions provided by law are met, the court approves the request for extradition, in which case the requested person through his/her defense before the highest court (Court of Appeals) through the appeal opposes the decision for extradition (Salihu, 2011, pp. 194-204).

If the extradition decision becomes final, the requested person may submit a request for evaluation of the legality of the extradition decision.

If the decision on extradition becomes final, then the requested person, through the lawsuit and the one before the Basic Court - Administrative Department, can initiate *proceedings on opening the administrative dispute* by challenging the legality of the decision on extradition.

In circumstances when the claim of the plaintiff-wanted person for extradition is rejected, the Minister of Justice issues a decision on allowing extradition, in which case through the MIA,

the execution of the final decision is requested by sending the same to the requesting state (Law no. 04 / L-213, 2013).

If the extradition procedure is meticulously considered, it means that it goes through all the foreseen legal stages, either as actions to be taken by the administrative or judicial bodies in the procedure, or the strict observance of the rights and freedoms of the person required. It implies that the whole procedure is based on the spirit of the law creating a good practice and standards for all bodies in the case of implementation of provisions in this area.

In the circumstances when one of these links is missing in the chain of procedural actions of the subjects related to the extradition, then we are dealing with violation of the provisions from the field of extradition procedure, which different nature measures may be imposed on violators, being of a disciplinary character, and even those of a political nature, or even those of a criminal ones.

Non-compliance with the provisions on direct extradition means their violation by the extradition authorities, which directly violates all conventions, bilateral agreements and the Constitution of the Republic of Kosovo.

Amongst the challenges that our bodies have experienced is the case of the so-called "Gulenists", who have been extradited to the Republic of Turkey, which in terms of form and content of actions of the actors of the Kosovar country does not resemble extradition at all, but more has the dimensions of a quiet and smooth "abduction", without noise, considering they are right while in fact they have committed the most serious violation of the Law on International Legal Cooperation, the Convention on Extradition, the Convention on Fundamental Human Rights and Freedoms (KEDNJ, 2010).

Consequences for inaction, against legal solutions or action contrary to these solutions have resulted in (Surroi, 2018):

- Six Turkish citizens with a legal stay in Kosovo until then, had their stay terminated with a sudden decision;
- The (non-public) reason for the termination was the assessment of the authorized body for them as suspected of terrorism;
- Termination of residence permits was considered as their transformation into citizens with illegal residence;
- As illegal, they were handed over by the relevant institutions to members of the Turkish secret service who arrived in Kosovo by special plane.

In the following situation, our country has not at all considered the extradition procedure of these Turkish citizens, acting with the roughest arbitrariness as such an action would exceed the dimensions of the actions, which would not be considered as actions taken by any lawful and authorized country institution.

The following case has completely tested the legal system of the country of Kosovo, which, given the nature of the violation, has seriously violated the freedoms and rights of citizens, which makes it difficult to recover for a long time.

Such measures, similar to extradition in the criminal-legal literature and in practice are known as kidnapping or covert extradition, where a typical example of kidnapping is the case of Oxhalan, a prominent activist of the Kurdish movement, who was abducted at an airport with the knowledge of a foreign country, by the secret police of Turkey and was sentenced by a Turkish court to death. In the current practices of the countries, it is not considered an illegal act (Salihu, 2011, pp. 202-204).

CONCLUSION

Extradition as a criminal institution for our country is important since Republic of Kosovo is considered as having an advanced criminal system, also from the field of extradition, in relation to international law but that in certain circumstances and due to political circumstances from time to time these provisions of international criminal law are not strictly enforced.

The actual case distresses the extradition without procedure of Turkish citizens to the Republic of Turkey and that with a verbal request of the respective structures of both countries without strictly following the procedure provided by the Law on International Legal Cooperation, violating their procedural rights as well as their freedoms and rights under the International Covenant on Human Rights.

Another issue in practice is the circumstances when the person wanted for extradition may be a foreign citizen who is wanted in a foreign country and the circumstances when a Kosovar citizen is wanted for extradition to a foreign country or a third country.

- a. In the circumstances when the extradition of a foreign citizen is submitted for extradition to his own country or to a third country, our country must necessarily follow all the procedures provided for extradition by appropriately considering the request for extradition to the requesting country, ensuring that all the essential conditions for acting on the extradition request have been met.
- b. In the circumstances when the extradition procedure is subject to the Kosovar citizen, then this fact excludes the general principle that the Kosovar citizen cannot be extradited, while the basic fact that serves as a basis for extradition is the bilateral agreement, which agreement emerges as the highest source of law against our criminal code (USA, Republic of Albania).

In these circumstances, overcoming obstacles that are purely political in the form of structures, whatever they might be which directly or indirectly affect the judiciary authorities in terms of preventing the implementation of provisions related to execution, requires time, commitment, access and a greater democratic and political culture, which in no way interfere with the

judiciary, to the extradition, in relation to any request coming from any country, powerful one or a weak one.

In the context of the raised hypothesis, there is the so-called "Case of the Gulenists", in which case the Kosovar justice from the international criminal field has failed the exam, not profiled any of the legal provisions on extradition, which calls our efforts into question for a deeper commitment to the observance of laws in the field of international criminal law or bilateral extradition agreements.

Despite the fact that many institutional bodies have raised their voices against this case, there have been only measures of administrative character against the officials of the relevant departments, although there were opportunities to initiate criminal proceedings against actors who participated in this "Extradition" without legal basis.

In other circumstances, without including the case of the Gulenists, our country has experience, is committed, and has the capacity to accurately implement the legal provisions in the field of extradition, which is a step forward in this direction.

REFERENCES

- Amnesty Internacional. (2017/18). *Report 2017/18- Turkey*. Retrieved from <https://www.refworld.org/docid/5a9938470.html>
- Constitution of the Republic of Kosovo. (2016, shkurt 24). *E amandamentuar*. Retrieved from https://biblioteka.sejm.gov.pl/wp-content/uploads/2017/05/Kosowo_alb_010117.pdf
- ekonomia-ks.com. (2018, March 30). *Haradinaj e shkarkon ministrin Sefaj dhe drejtorin e AKI-se, Driton Gashin*. Prishtinë, Republika e Kosovës. Retrieved from <http://www.ekonomia-ks.com/sq/siguri/haradinaj-e-shkarkon-ministrin-sefaj-dhe-drejtorin-e-aki-se-driton-gashin>
- ETS no. 24. (1960). *Konventa Evropiane mbi Ekstradimin*, 13. Article 18. Retrieved from <https://rm.coe.int/16806ed48e>
- Gerhard, W. &. (2014). *Principles of International Criminal Law*, 39-41. New York, USA: Oxford University Press. doi:10.1093/law/9780198703594.001.0001
- Gudmundur, A. &. (1999). *Deklarata Universale mbi të Drejtat e Njeriut*, 247-250. The Hague Holande: UNHCR Human Rights Support Programme Kosovo.
- Gülen movement. (2021, January 24). *From Wikipedia, the free encyclopedia*. Retrieved from <https://www.wikimediafoundation.org/>
- Human Rights Watch. (2017). *World Report 2017: Turkey*. Retrieved from <https://www.hrw.org/world-report/2017/country-chapters/turkey>
- KEDNJ. (2010).
- KEDNJ. (2010). *Konventa Evropiane për të Drejtat e Njeriut*. Gjykata e Evropiane e të Drejtave të Njeriut, Council of Europe: KDNJLTH, Article 1.
- Law no. 04 / L-213. (2013). *Article 6-40*.
- Law no. 04 / L-213. (2013). *Article 71-73*.
- Law no. 04/L-213. (2013, Shtator 2). *Ligji për Bashkëpunim Juridik Ndërkombëtar në Çështje Penale*. Prishtinë, Republika e Kosovës.
- Law no. 04/L-219. (2013, 09 05). *Ligji për të Huajt*. Kuvendi i Republika e Kosovës: Article 5. Retrieved from <https://gzk.rks-gov.net/ActDetail.aspx?ActID=8876>
- Low no. 04/L-213. (2013). Articles 516-532.
- Ombudsperson Institution. (2018). *Annual Reaport Nr. 18*, 226. Prishtinë, Republic of Kosovo: 2019. Retrieved from file:///C:/Users/Arsim/Downloads/Kosovo_OM_Annual%20Report_2018_EN.pdf
- Reuters. (2018, March 29). *Six Turks arrested in Kosovo over Gulen links extradited to Turkey: Anadolu*. Retrieved from <https://www.reuters.com/article/us-turkey-security-kosovo-idUSKBN1H51JL>
- Robert, C. H. (2007). *Introduction to International Law and Procedure*, 39-41. New York, USA: Cambridge University Press. Retrieved from www.cambridge.org/9780521876094

- Sahiti, E. & Zejneli, I. (2017). *E Drejta e Procedurës Penale e Republikës së Maqedonisë*. 359-364. Shkup, RMV: SEEU.
- Salihu, I. (2011). *E Drejta Penale Ndërkombëtare*, 154-155. Prishtinë, Republika e Kosovës: Kolegji FAMA.
- Salihu, I. (2011). 184.
- Salihu, I. (2011). 185.
- Salihu, I. (2011). 186.
- Salihu, I. (2011). 166-183.
- Salihu, I. (2011). 198-199.
- Salihu, I. (2011). 194-204.
- Salihu, I. (2011). 202-204.
- Salihu, I. (2015). *E Drejta Penale - Pjesa e Përgjithshme*. Prishtinë, Republika e Kosovës: Universiteti i Prishtinës.
- Surroi, V. (2018). *Veton Surroi me letër deputetëve të Kuvendit të Republikës së Kosovës*. Botuar fillimisht në Koha Ditore më 30.03.2018, shtuar në Portalin Albeu më 31.03.2018. Retrieved from <http://www.albeu.com/kosove/veton-surroi-me-leter-deputeteve-te-kuvendit-te-republikes-se-kosoves/385934/>
- The Rome Statute of the International Criminal Court. (2002). *I*. ICC The Hague, The Netherlands.
- Wikipedia. (2021, January 16). Gülen, Fethullah. *The free encyclopedia*. Retrieved from <https://www.wikimediafoundation.org/>