

OPEN summary of Annex 3 Project Policy Justification

Policy justification for Crime-State Nexus Project's Exclusions

This annex is submitted in support of the referral to exclude Albanian individuals from the UK due to their links to organised crime and corruption.

The Crime-State Nexus (CSN) project is a new UK joint HO-FCDO initiative that is designed to disrupt the symbiotic links between politics and crime in the Western Balkans, as part of HMG's campaign to tackle Organised Crime Groups (OCGs) in the region. UK intelligence has shown that Albanian OCGs present the greatest immediate and direct threat to the UK. The CSN project is therefore initially being piloted in Albania. However, it is anticipated that the project will be rolled out to other Western Balkans countries (Montenegro, North Macedonia, Serbia, Bosnia & Herzegovina, Kosovo) subject to the outcome of the project's monitoring and evaluation, and its overall success.

The links between politics and crime in the Western Balkans create a permissive environment in which serious criminals and organised crime groups (OCGs) can operate and benefit from the political protection of corrupt politicians from law enforcement activity. This political protection also provides OCGs with additional routes to launder money, and enables them to use Albania as a safe haven from which to operate. In exchange, OCGs will help a politician during elections by buying votes and intimidating voters.

The CSN project aims to disrupt these links by coordinating UK action against Politically Exposed Persons (PEPs) on all sides of Albanian politics in the first instance. As well as exclusion from the UK, UK action could include sanctions and other diplomatic levers such as strategic comms. Fundamental to the UK's approach is close cooperation with our local and international partners. We will work with Albanian authorities, the judiciary, civil society, media, and our international allies to take a coordinated approach to tackle serious and organised crime and corruption.

UK action to expose corrupt PEPs aims to reduce their credibility amongst both the Albanian public and political elite, demonstrating both the international and domestic repercussions of tolerating corruption within political parties. By increasing the political costs of engaging in corruption, the objective is to disincentivise Albanian politicians from offering political protection to OCGs. Reduced political protection should make OCGs more vulnerable to law enforcement activity in Albania and disrupt their business model. This effort is also reinforced by how we are enhancing the capacity and confidence of the national prosecution and judicial system to tackle crime and corruption, alongside other partners. Action by the UK will often be most accepted locally when off the back of national prosecutions or where those are seen to be unable to take action. In parallel, restricting OCG ability to function effectively in Albania in this way supports wider activity to reduce the harm they cause in the UK itself.

Albanian OCGs present an acute threat to the UK. They are assessed as significant players in the UK cocaine market and more widely are highly prevalent across serious and organised crime domestically. This is reflected in

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the fact that Albanians comprise the largest nationality of Foreign National Offenders in the UK. The recommended exclusions are in line with other UK activity to tackle Albanian OCGs. For example, the UK has recently acted to exclude Fation Dauti from the UK. This individual is head of an Albanian OCG and is also directly implicated in our case to exclude Sali Berisha.

Overall, the CSN project aims to:

- weaken the threat posed to the UK by Western Balkans OCGs
- protect the UK's interests in the Western Balkans
- support efforts to strengthen democracy in the region
- reduce the public perception that criminals can operate with impunity
- strengthen the UK's reputation and credibility as a partner in tackling high level corruption

Methodology:

A range of OPEN sources have been used to provide evidence to support the cases. We have predominantly used English-language Albanian media outlets such as Albanian Daily News, Exit News, and the Balkan Investigative Reporting Network (BIRN). These sources are generally reputable, particularly BIRN. However, as in all countries there can be some politicisation of media reporting. For example, Exit News is known to be more “right-leaning” and so supportive of the opposition Democratic Party.

We have therefore supported these English-language OPEN sources with Albanian-language media reporting. This is to ensure that the cases are built using evidence from a wide array of sources and to provide further confidence in their validity. To further mitigate the risk that Albanian media sources are influenced by political or private interests, we have supplemented this with OPEN source material from alternative reputable sources. For example, in our analysis we have included information from respected non-governmental organisations such as the Organised Crime and Corruption Reporting Project (OCCRP) and Transparency International, which is dedicated to tackling corruption that is supported by a range of Western government agencies, including the FCDO. We have also included evidence from international media organisations such as respected German journalists BILD, Reuters, the UK media outlet the Express, and Al-Jazeera.

The validity of our analysis is strongly supported by the action taken by other nations. The US, for example, has designated targeted individuals as “persona non grata” due to corruption.

Given this, while the exact degree of confidence varies according to each case, in we are **confident** in the validity of the information provided for each individual.