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Mr Leopoldo Maldonado Gutiérrez
Special Rapporteur on the promotion and
protection of the right to freedom of
opinion and expression
OHCHR-UNOG
8-14 Avenue de la Paix
1211 Geneve 10
Switzerland

9 November 2026

BY EMAIL ONLY ([redacted])

Dear Special Rapporteur

Our client: Mr Erion Veliaj
Submission of information regarding events taking place since 28 October 2026 and request for urgent appeal

We act for Mr Erion Veliaj, the Mayor of Tirana in Albania.

We are writing to you today to request your immediate intervention by way of an urgent appeal to the Government of Albania. Attached to this letter is a factual summary of Mr Veliaj's current circumstances and an abridged history of the criminal proceedings in Albania.

Introduction and summary of relevant events

In February 2025, Mr Veliaj was arrested and detained on allegations of corruption and money laundering. From 10 February 2025 to 28 October 2026, Mr Veliaj was detained in pre-trial detention in IEVP Durrës, an open prison in Albania without incident.

As you may be aware, in recent months, widespread student-led "Flamingo" protests have taken place across Albania; in that context, on 26 October 2026, an Instagram post was published on Mr Veliaj's behalf, commenting on recent student-led protests in Belgrade, Serbia.[1] Two days later, on 28 October, Mr Veliaj was transferred without notice to a notorious closed, Communist era, high-security prison called IEVP Fier. Mr Veliaj was not served with a transfer order, nor given a reason for the sudden transfer. A further two days elapsed before Mr Veliaj received a visit at IEVP Fier from

[1] See enclosed screenshot of Instagram post (in Albanian original and English machine translation).

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the Albanian Minister of Justice, Mr Toni Gogu who told Mr Veliaj that his transfer had been ordered personally by Prime Minister Edi Rama.

During the same visit, Mr Gogu "conveyed" certain demands made of Mr Veliaj by Prime Minister Edi Rama, namely that he was to (i) make false admissions of guilt to "organising and financing" the Flamingo protests; (ii) resign as Mayor, transfer his mandate to persons named by Mr Rama; and (iii) dismiss his lawyer. The demands made of Mr Veliaj were accompanied by threats that if he failed to do as instructed, he would be charged with offences of disrupting the constitutional order, face a "100 year" prison sentence and be transferred to another notorious Communist-era prison. It is a matter of profound concern that Mr Veliaj has been intimidated and threatened in the manner described above, apparently in response to a single Instagram post, which simply expressed support for student-led protests in Belgrade. Without further enquiry or explanation, the above sequence of events suggests that senior figures within the Albanian Government have attempted to prevent Mr Veliaj from exercising his right to freely express his views and opinions as to the recent student-led protests in Europe.

As will be apparent from the appendix to this letter, the attempt to harass and intimidate Mr Veliaj did not end with the Minister of Justice's visit to his cell at IEVP Fier on 28 October. Mr Plarent Ndreca, who has represented Mr Veliaj in the domestic criminal proceedings in the ordinary and appellate courts, received several phone calls from Edi Rama regarding his client.[2] Mr Ndreca is also a former Member of Parliament for the Socialist Party and remains an active and well-known figure within the Socialist Party.

Pursuant to the Commission on Human Rights resolution 1993/45, your mandate includes gathering relevant information about threats, use of violence and harassment (including persecution and intimidation) directed at persons seeking to exercise or promote the exercise of their right to freedom of expression and opinion. Your mandate furthermore requests you to seek credible and reliable information from Governments who may have knowledge of such cases.

We submit that the events concerning Mr Veliaj, taking place since Wednesday 28 October 2026, engage your mandate in the following two respects:

1. **Intimidation experienced by Mr Veliaj for expressing support on social media for student-led protests in Belgrade**

The information submitted in this letter has come about against a backdrop of student protests and widespread public unrest in Europe in recent months (notably in France and Italy). Similar unrest has manifested in the Balkan countries; in Albania, the youth-led "Flamingo" student movement first emerged in response to the infamous proposed luxury resort and tourism developments on Sazan Island, proposed by the US businessman and politician Jared Kushner and supported by the Albanian Prime Minister, Edi Rama.

Opposition to those luxury resort proposals has, over time, developed into a wider anti-government student movement, led by a group who call themselves the

[2] See enclosed statement of Mr Plarent Ndreca dated 3 November 2026, which summarises the content of messages and phone calls received directly from Prime Minister Edi Rama.

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"Flamingos". Anti-government protests have now been held daily for more than four months, during which repeated calls have been made for Mr Rama to resign.

In relation to separate student-led protests taking place in Belgrade, Serbia – on Monday 26 October 2026, Mr Veliaj's Instagram account published a photo of a peaceful demonstration with a caption which reads as follows:

> *"Congratulations to the students on bringing down Belgrade's Machiavellian populist! Student movements and protests are not 'the end of the world', but the end of 'a world'. The sooner we understand this as citizens and policymakers, the better we will know how to respond to the needs and expectations of this generation."*

On Wednesday 28 October, two days after publication of this Instagram post, Mr Veliaj was suddenly removed from IEVP Durrës prison and transferred to IEVP Fier prison, a closed prison with more severe security measures. Mr Veliaj was forcibly taken from his prison cell without prior notice and without initially being told his destination. Mr Veliaj was not presented with a transfer order, nor were the reasons for his transfer disclosed to him.

As of the date of this letter, the official reason for Mr Veliaj's transfer remains undisclosed. We understand from the report of the Albanian Helsinki Committee ("**AHC**"), further to its visit to IEVP Fier prison on 30 October, that the transfer order gave only general "security reasons" as justification for the transfer. We also understand that this order is classified as "restricted" for up to two years.[3]

Mr Veliaj believes, and the sequence of events lends support to the view, that he has been transferred to a higher-security prison on the instruction of Mr Rama in retaliation for the views expressed in his Instagram post commenting on the Belgrade student demonstrations. In our submission, the events capable of supporting this proposition are as follows:

- During Justice Minister Toni Gogu's visit to IEVP Fier in the evening of 30 October, Mr Gogu told Mr Veliaj that Mr Rama had personally ordered his transfer and isolation;

- During the same visit and on the instruction of Mr Rama, Mr Gogu demanded that Mr Veliaj admit to supporting, organising and financing the "Flamingo" student protests – an allegation which Mr Veliaj robustly denies;

- In the event that Mr Veliaj refuses to admit involvement with the "Flamingo" movement, Mr Gogu threatened that additional criminal charges of "undermining the constitutional order" would be brought against Mr Veliaj. Mr Veliaj would also be transferred to a more severe prison and would serve "100 years" there.[4] This is a serious violation of Mr Veliaj's right to a presumption of innocence;

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[3] Please see further information in the appended factual background and enclosed report of the Albanian Helsinki Committee.

[4] See enclosed Facebook post of Erion Veliaj dated 2 November 2026 (which contains his contemporaneous handwritten note of Mr Gogu's visit), and Mr Veliaj's form and letter to the judge, Ms Ulliri, at the Special Court of First Instance for Corruption and Organised Crime ("**GJKKO**").

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- Mr Gogu also demanded that Mr Veliaj resign as mayor, delegate his mandate to a person selected by Mr Rama and cease consulting his privately instructed lawyer, Mr Ndreca;

- Further procedural irregularities and shortcomings in the conditions of Mr Veliaj's detention following his transfer to IEVP Fier have been noted in the AHC's report;

- According to media reports, the Director General of Prisons, Ms Bodo, had already submitted her resignation at the time that she took the necessary steps for Mr Veliaj to be transferred to IEVP Fier;

- Mr Veliaj's lawyer, Mr Ndreca, has received direct and aggressive phone calls from Mr Rama. During such calls, Mr Rama has accused Mr Ndreca of "leaking false material into the media" for his client. Mr Rama said: "He [Mr Veliaj] has every right to rave (për të deliruar), [5] but you are not entitled to do the same or to bring his ravings (delirime) to the media". Mr Rama told Mr Ndreca that he was a "bad political adviser" and was "leading Mr Veliaj into a "dead end"". Mr Rama has repeatedly insulted and criticised Mr Ndreca for his representation of and advice given to Mr Veliaj.

Of primary concern is that intimidatory acts described in this letter appear to have been directed at Mr Veliaj for expressing pro-protest and pro-student movement views on social media.

If Mr Veliaj's complaint is made out, it is unconscionable that a public official's endorsement of a student protest outside of Albania has been equated with a disruption of the constitutional order merely because senior officials within the Albanian executive regard such views as politically undesirable, and it represents a serious attempt to restrict or suppress Mr Veliaj's freedom of opinion and expression.

Mr Veliaj has publicly rejected the accusation that he organised or financed the protests and has challenged Mr Rama to produce evidence substantiating the allegations. As at the date of this letter, we are not aware of any such evidence having been produced.

Mr Gogu has publicly confirmed that he did visit Mr Veliaj in prison in the evening of 30 October, however, he denies the demands and threats attributed to him.

2. Suppression of Mr Veliaj's freedom of expression and opinion through his lawyer

Attempts to violate Mr Veliaj's freedom of opinion and expression have also been directed to his lawyer, Mr Ndreca.

Mr Ndreca has received intimidatory calls directly from the Prime Minister, the content of which is described above. During these calls, Mr Rama has accused Mr Ndreca of leaking "false material" to the media, criticised Mr Ndreca in his role as Mr Veliaj's lawyer and instructed him to act as a "filter" for Mr Veliaj's "ravings".

[5] This word does not translate easily to English, but can be understood as "rave" or "hallucinate".

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In our opinion, the intent behind the words used by Mr Rama is self-evident. The Prime Minister was not merely expressing political disagreement with Mr Ndreca as a fellow member of the ruling Socialist Party. He was seeking to dictate the limits of what Mr Ndreca was permitted to do and say in relation to his client. In effect, he expected Mr Ndreca, by virtue of his political affiliation and relationship with Mr Rama, to subject Mr Veliaj's public communications to a 'political filter' aligned with Mr Rama's own interests.

Accordingly. these intimidatory phone calls – made by the official holding the highest political office in Albania – represent an attempt to prevent our client's account of recent events from reaching the public.

Urgent appeal

For the avoidance of doubt, we are inviting the Special Rapporteur to submit an urgent appeal to the Government of Albania, given that Mr Veliaj remains in detention at IEVP Fier.

We would invite the Special Rapporteur to consider that there is a reasonable evidential basis upon which to conclude that the apparently punitive transfer of Mr Veliaj to a harsher custodial environment, the visit of Mr Gogu and the threats he conveyed on Mr Rama's behalf, and the subsequent attempt to intimidate Mr Ndreca were acts intended to censure or punish Mr Veliaj for expressing support for student protests in Belgrade in a social media post. Accordingly, we request that urgent action is taken to ensure that Mr Veliaj is not further penalised, either by being subjected to inhuman and degrading treatment in detention or further threatened with manifestly unfounded accusations of serious criminal conduct as a consequence of expressing his opinions in a public forum.

Additionally, the events complained of in this letter have implications beyond Mr Veliaj's own position. The Special Rapporteur is invited to consider whether there are grounds to investigate the wider implications for freedom of expression and opinion in Albania, and whether the treatment that Mr Veliaj has been subjected to may have a chilling effect on the exercise of this fundamental right by politicians, campaigners, and student leaders.

Action requested

As it concerns Mr Veliaj, we respectfully request that you issue an urgent appeal asking the Government of Albania to:

i. Respond promptly and substantively to the reprisals experienced by Mr Veliaj described above (including Mr Veliaj's transfer to IEVP Fier, the demands and threats made by Mr Gogu during his visit to Mr Veliaj in prison, and the content of phone calls made by Mr Rama to Mr Ndreca).

ii. Give reasons for Mr Veliaj's transfer to IEVP Fier on 28 October;

iii. Provide assurances that Mr Veliaj will not be the subject of further reprisals as a consequence of exercising his freedom of expression and opinion, particularly as regards political commentary;

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iv. Provide specific assurances that threats concerning detention conditions, prison transfers and criminal charges will not be used to silence Mr Veliaj or coerce admissions or political concessions;

v. Initiate a prompt, independent and impartial investigation into whether Mr Veliaj's prison transfer and subsequent treatment were carried out for improper purposes or influenced by ministerial interference as alleged herein;

vi. Request assurances in relation to any investigation that appropriate confidentiality measures will be put in place to protect sources that may be at risk of reprisals for cooperating with an investigation;

vii. Propose measures to ensure that Mr Veliaj is permitted to express his views and communicate his account whilst detained, including through persons acting on his instructions (such as Mr Ndreca), without intimidation or retaliation.

In relation to the wider implications for freedom of opinion and expression in Albania, we respectfully invite you to:

i. Enquire into safeguards against the use of public-order or national-security allegations to silence political commentary and support for student-led "Flamingo" protests (or other lawful protests and civil unrest) in Albania;

ii. Request information on measures taken by Albanian authorities to prevent, investigate and remedy reprisals experienced by those expressing such support or reporting abuses; and

iii. Make recommendations addressing the chilling effect of recent days' events on Albanian society more widely.

For the avoidance of doubt, we do not ask you to adjudicate the underlying criminal allegations.

We are mindful that any action taken by the Special Rapporteur arising from this letter does not operate as a judicial or quasi-judicial process, and that your recommendations are not enforceable orders.

Consent and further information

We are instructed that Mr Veliaj and Mr Ndreca consent to the disclosure of their names and identities to the Albanian government, other governments, intergovernmental organisations, businesses and military or security companies, for the purpose of the Special Rapporteur's actions arising from receipt of this urgent appeal and submission of information. Mr Veliaj and Mr Ndreca also consent to their names appearing in a public report to the Human Rights Council.

We would be grateful for your urgent consideration. Should you require further information, please do not hesitate to contact the undersigned parties.

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Yours faithfully

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This material is distributed by Kasowitz LLP on behalf of Erion and Arber Veliaj. Additional information is available at the Department of Justice, Washington, DC.

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Sra. Andrea Bolaños Vargas
Special Rapporteur on the situation of
human rights defenders
8-14 Avenue de la Paix
1211 Geneve 10
Switzerland

6 November 2026

[redacted]

Dear Special Rapporteur

Submission of information on behalf Mr Plarent Ndreca in the context of his legal representation of Mr Erion Veliaj

We act for Erion Veliaj, the mayor of Tirana, the capital city of Albania. Mr Veliaj is currently in pre-trial detention in Albania, having been arrested in February 2025 and subsequently charged with offences of corruption and money laundering. Attached to this letter is a factual summary of Mr Veliaj's current circumstances and an abridged history of the criminal proceedings in Albania.

Save for the initial remand hearings before the ordinary courts, Mr Veliaj has been represented throughout by Mr Plarent Ndreca, a practising lawyer in Tirana. Mr Ndreca is also a former Member of Parliament for the Socialist Party and remains an active and well-known figure within the Socialist Party.

Mr Ndreca has appeared before the ordinary courts, the Supreme Court and the Constitutional Court in Albania on Mr Veliaj's during in the currency of these proceedings. He has fearlessly represented his client's interests before those tribunals and has consistently argued that Mr Veliaj's rights guaranteed by the Albanian Constitution and the European Convention on Human Rights ('ECHR') have been violated. In particular, Mr Ndreca has argued breaches of (i) Article 5 § 1(c) (absence of reasonable suspicion); (ii) Article 5 § 4 (denial of an opportunity to effectively challenge the lawfulness of detention); (iii) Article 6 §§ 1 and 3 (b) and (c) (failure to grant effective participation in the proceedings); and (iv) Article 6 § 2 (presumption of innocence).

On 29 October 2026, as Mr Veliaj's international co-counsel, and with the assistance and support of Mr Ndreca, Mishcon de Reya LLP filed an application against Albania with the European Court of Human Rights arising from decisions made by the pre-trial chamber and appellate courts in that jurisdiction to continue with the security (or

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precautionary) measure of remand in custody. In the application, we pleaded the above violations, in conjunction with a complaint under Article 18 ECHR that the predominant, ulterior purpose of prosecuting Mr Veliaj and his pre-trial detention is political.

The purpose of this communication is to provide you, the Special Rapporteur, with information about the treatment that Mr Ndreca has been subjected to by senior figures within the Albanian Government by reason of his role as a human rights defender and legal counsel to Mr Veliaj; and invite you to take urgent action.

Background

As foreshadowed above, Mr Veliaj was arrested and detained on allegations of corruption and money laundering on 10 February 2025. From that date until 28 October 2026, Mr Veliaj has been detained at IEVP Durrës, an open / low-security prison in Albania. On Wednesday 28 October, Mr Veliaj was transferred from IEVP Durrës to a higher-security prison, IEVP Fier without notice. He was not provided with a transfer order or reasons for his transfer; he was forcibly removed without initially being told where he was being moved to. His lawyer and family were not promptly notified of his transfer (as required under Albanian law). Mr Veliaj has subsequently received a private visit from the Albanian Minister of Justice, Mr Toni Gogu. What was said by Mr Gogu at that meeting was significant, for reasons that we will come to.

Between 10 October and 2 November 2026, Mr Ndreca has been directly approached by the Prime Minister of Albania, Edi Rama – via messages and phone calls – on three occasions in relation to his representation of Mr Veliaj.[1] We set out further below, the content of those communications.

Under the Commission on Human Rights resolution 2000/61, one of the main activities in your mandate is to seek, receive, examine and respond to information on the situation and the rights of anyone, acting individually or in association with others, to promote and protect human rights and fundamental freedoms. You also establish cooperation and conduct dialogue with Governments on the promotion and effective implementation of *the Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms* (the "**Declaration**"). Further, you also recommend effective strategies to protect human rights defenders and follow up on such recommendations.

<u>Intimidation of Mr Ndreca in his role as a human rights defender</u>

On 10 October 2026, Mr Ndreca received a message from Mr Rama. Mr Rama expressed dissatisfaction with what he described as "Mr Ndreca's encouragement of [Mr Veliaj] to become independent of [Mr Rama]". Mr Ndreca described his response as follows:

> *"In my response, I explained, in essence, that if my political position and Mr Rama's political interests did not align with [Mr Veliaj's] interests, I would*

[1] See enclosed note of Mr Plarent Ndreca dated 3 November 2026 which summarises Mr Ndreca's interactions with Prime Minister Edi Rama.

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choose to defend my client. I emphasised that [Mr Veliaj] was in a situation in which he needed protection and support."

On 21 October 2026, Mr Ndreca received a direct phone call from Mr Rama. Mr Ndreca describes this call as follows:

"Mr Rama called me again and conveyed the same concern. He also told me, in essence, that I should not stand in his [Mr Rama's] way in relation to the municipality [of Tirana] (which I understood to mean that [Mr Rama] should have control over the municipality) and that I should not interfere in municipal affairs.

During this call, [Mr Rama] insulted me. My response was calmer, and I did not insult him."

As described above, on 28 October 2026, Mr Veliaj was transferred without notice from IEVP Durrës to IEVP Fier. On 30 October 2026, Justice Minister Toni Gogu visited Mr Veliaj at approximately 22:30. Mr Gogu told Mr Veliaj that Prime Minister Edi Rama had personally ordered his transfer and isolation.

We understand from a contemporaneous handwritten note and a letter from our client sent to the trial judge in his case that Mr Gogu directed a number of demands and threats to Mr Veliaj during his visit. Mr Gogu demanded that Mr Veliaj admit supporting, organising and financing in the "Flamingo" student movement, relinquish his mayoral mandate and cease consulting his lawyer Mr Plarent Ndreca. The demands made of Mr Veliaj were accompanied by threats that if he failed to do as instructed, he would be charged with offences against the constitutional order, face a "100 year" prison sentence and be transferred to a notorious Communist-era prison.

Mr Gogu has confirmed that this visit took place, however, he denies making the demands and threats attributed to him.

On 2 November, the pressure extended directly to Mr Ndreca once more. Mr Ndreca's enclosed statement records three unanswered calls from Mr Rama, followed by two telephone conversations lasting approximately three to four minutes. Mr Rama criticised Mr Ndreca's advice to Mr Veliaj, accused him of leaking false material to the media and said: "He [Mr Veliaj] has every right to rave (për të deliruar), [2] but you are not entitled to do the same or to bring his ravings (delirime) to the media". Mr Rama told Mr Ndreca that he was a "bad political adviser" and was "leading Mr Veliaj into a "dead end".

In our opinion, the intent behind the words used by Mr Rama is self-evident. The Prime Minster was not merely expressing political disagreement with Mr Ndreca as a fellow member of the ruling Socialist Party. He was seeking to dictate the limits of what Mr Ndreca was permitted to do and say in relation to his client. In effect, he expected Mr Ndreca, by virtue of his political affiliation and relationship with Mr Rama, to subject Mr Veliaj's public communications to a 'political filter' aligned with Mr Rama's own interests.

[2] This word does not translate easily to English, but can be understood as "rave" or "hallucinate".

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Mr Ndreca's response to Mr Rama's criticisms is summarised in his own statement:

> *"My position was that defending and supporting my client [Mr Veliaj] would take priority if his interests did not align with Mr Rama's political interests or with my own political position."*

We would invite the Special Rapporteur to consider the exchanges between Mr Rama and Mr Ndreca with care: in our submission the central issue is not that the Prime Minister contacted Mr Ndreca, but that he sought to make the exercise of Mr Ndreca's mandate to represent his client conditional upon his political loyalty. The confrontational and insulting language used by Mr Rama further reinforces this concern. It indicates that these exchanges went beyond political discussion or advice and amounted, in Mr Ndreca's view, an attempt to impose Mr Rama's political interests and strategy upon the defence strategy.

The instruction to act as a "filter" is especially significant to this mandate. Mr Ndreca is not only being pressured to alter his legal advice but also to inhibit the communication of his client's account of the conditions of his detention, the criminal proceedings against him and his grievances to the wider public.

Taken together, Mr Gogu's demand that Mr Veliaj dismiss him and the Prime Minister's direct criticism of Mr Ndrecu's advice demonstrates that there is pressure on both sides of the lawyer-client relationship, the ultimate aim of which appears to be to limit Mr Ndreca's ability to promote and protect his client's human rights and fundamental freedoms.

In spite of the attempts at intimidation by senior figures within the Government of Albania, Mr Ndreca nevertheless continued to represent Mr Veliaj, including at the hearing on 3 November 2026. At that hearing, Mr Veliaj also invited the trial court to investigate the Justice Minister's conduct, but the court declined to act on jurisdictional grounds. His continued representation does not diminish the seriousness of the alleged intimidation. The immediate concern is the risk of further pressure or retaliation and the need to protect his ability to advise, represent and defend his client independently.

Urgent appeal

For the avoidance of doubt, we are inviting the Special Rapporteur to submit an urgent appeal to the Government of Albania, given that Mr Ndreca has repeatedly been contacted directly by Mr Rama in relation to his representation of and advice to Mr Veliaj, who remains in detention at IEVP Fier.

Action requested

We respectfully request that you issue an urgent appeal asking the Government of Albania to:

i. Respond promptly and substantively to the matters described above, including the purpose and circumstances of the Prime Minister's direct approaches to Mr Ndreca and the alleged demand, conveyed by the Justice Minister Toni Gogu to Mr Veliaj, that he cease consulting Mr Ndreca;

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ii. Secure a prompt, independent and impartial investigation into the alleged intimidation of Mr Ndreca because of his work protecting Mr Veliaj's human rights, including pressure directed at Mr Veliaj to dismiss him;

iii. Provide assurances that Mr Ndreca will be able to continue advising and representing Mr Veliaj, and promoting and protecting his human rights, without intimidation, obstruction or retaliation;

iv. Provide assurances that Mr Ndreca should be able to communicate freely, confidentially and securely with his client, and that confidential lawyer-client communications will not be unlawfully monitored or intercepted.

v. Provide assurances that threats concerning criminal charges, detention conditions or prison transfers will not be used to compel Mr Veliaj to cease consulting Mr Ndreca or otherwise obstruct Mr Ndreca's work on his client's behalf.

Consent and further information

We are instructed that Mr Veliaj and Mr Ndreca consent to the disclosure of their names and identities to the Albanian government, other governments, intergovernmental organisations, businesses and military or security companies, for the purpose of the Special Rapporteur's actions arising from receipt of this urgent appeal and submission of information. Mr Veliaj and Mr Ndreca also consent to their names appearing in a public report to the Human Rights Council.

We would be grateful for your urgent consideration. Should you require further information, please do not hesitate to contact the undersigned parties.

Yours faithfully

Mishcon de Reya LLP

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This material is distributed by Kasowitz LLP on behalf of Erion and Arber Veliaj. Additional

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information is available at the Department of Justice, Washington, DC.

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of Judges and Lawyers
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1211 Geneve 10
Switzerland

5 November 2026

BY EMAIL ONLY ([redacted])

Dear Special Rapporteur

Our client: Mr Erion Veliaj
Submission of information regarding events taking place since 28 October 2026 and request for urgent appeal

We act for Mr Erion Veliaj, the Mayor of Tirana in Albania.

We make this submission of information and request your immediate intervention by way of an urgent appeal to the Government of Albania.

We attach an appendix to this letter setting out the factual background to Mr Veliaj's current predicament and, in particular, invite your attention to a summary of events that have taken place since 28 October 2026.

Mr Veliaj has, in recent days, experienced serious attacks on his right to independent legal representation. These attacks raise grave concerns about potential government interference with the administration of justice and safeguarding of fundamental rights in Albania.

Under paragraphs 3(a) and 3(b) of the Commission on Human Rights resolution 1994/41, your mandate encompasses inquiry into substantial allegations concerning the independence of judges, lawyers and court officials, and the identification and recording of such attacks, together with making concrete recommendations. We submit that the events that have taken place in Tirana since 28 October 2026 that have affected our client and his lawyer engage this mandate in three distinct, but connected, respects:

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1. **The Justice Minister's intervention, coercion of a defendant and interference with his choice of lawyer**

The Albanian Justice Minister Toni Gogu visited Mr Veliaj on 30 October at around 10.30pm, at the IEVP Fier prison.

During this visit Mr Gogu conveyed that the Prime Minister, Mr Edi Rama, had personally ordered Mr Veliaj's transfer to and isolation at IEVP Fier. On the Prime Minister's instruction, Mr Gogu delivered demands that Mr Veliaj should:

(a) admit involvement in the "Flamingo" student movement (namely, supporting, organising and financing the Flamingos and students); [1]
(b) relinquish his mayoral mandate; and
(c) cease consulting his lawyer, Mr Plarent Ndreca.

These demands were accompanied by the threat that further criminal charges of undermining the constitutional order would be brought against Mr Veliaj by SPAK, the Special Anti-Corruption and Organised Crime prosecutor. Mr Veliaj was also threatened with the prospect of further lengthy terms of imprisonment and a transfer to another notorious Communist-era prison, IEVP Mine Peza unless he gave into the Minster's demands.

We would invite you to consider that this exchange, which took place in a custody setting, shortly after Mr Veliaj had been transferred from another prison without warning or legal authority, clearly constitutes an attempt by the Minister responsible for the prison system to exploit Mr Veliaj's vulnerability to extract a number of concessions from him, including the dismissal of his chosen lawyer. In our submission, it is unacceptable for any individual to be forced to make a choice between retaining a lawyer of his choosing (who had represented him for well over a year in numerous first instance and appellate court hearings), and avoiding additional prosecution and/or harsher detention conditions. Moreover, this improper use of ministerial access to an individual in pre-trial detention strikes directly at the independence of the defence and the integrity of criminal proceedings.

On 3 November, Mr Veliaj brought the Justice Minister's conduct to the attention of the first instance trial court in a written letter requesting a full and independent investigation. The court declined to take action on the basis that it does not have jurisdiction.

Mr Gogu has publicly acknowledged that this visit took place, although he denies conveying the demands and threats attributed to him. We submit that this denial is no substitute for an independent investigation into a ministerial intervention of this seriousness.

2. **The Prime Minister's direct interference with Mr Ndreca's instruction**

[1] Mr Veliaj strongly denies he has been involved in organising or financing the Albanian "Flamingo" student movement as alleged by Mr Gogu and Mr Rama. We understand that these allegations have been made against Mr Veliaj solely on the basis of an Instagram post published on his behalf on 26 October 2026, in support of separate student protests taking place in Belgrade, Serbia.

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On 2 November, Prime Minister Edi Rama made three calls directly to Mr Ndreca and engaged him in two tense telephone conversations. The Prime Minister criticised Mr Ndreca's advice to Mr Veliaj, accused him of leaking false material, and told him that he must act as a "filter" for Mr Veliaj's "hallucinations" rather than transmit such hallucinations to the media.

The Prime Minister's approaches to Mr Veliaj's lawyer on 2 November followed earlier calls in October. On those calls, the Prime Minister expressed dissatisfaction with Mr Ndreca's advice to his client and told him not to stand in the Prime Minister's way in relation to the municipality.

We submit that this is plainly an example of political pressure at the most senior level of the executive being directed at a practising lawyer because of the advice and representation he provides to his client. Mr Ndreca's professional obligations are owed to his client – not to the Prime Minister's political interests or the Albanian Socialist Party's agenda. Attempts by the head of government to dictate how Mr Ndreca advises his client or acts on instructions cannot be treated as anything other than a serious and flagrant interference with his independence. These instructions must also be considered alongside the demand, conveyed to Mr Veliaj in custody, that he immediately cease instructing Mr Ndreca.

Mr Ndreca has continued to represent Mr Veliaj, including at a subsequent court hearing on 3 November. His and his client's refusal to yield to the demands of two senior Government Ministers does not diminish the seriousness of the interference or the urgent need to prevent its repetition and any retaliation.

3. Interference with prosecutorial independence: the use of threatened charges as executive leverage

Ahead of the hearing on 3 November, Mr Veliaj informed the Court that Mr Gogu told him that prosecutors were preparing additional charges against him and were negotiating with the Prime Minister regarding this. Mr Veliaj's contemporaneous handwritten account of Mr Gogu's visit also describes further charges being threatened if he did not admit involvement with the student movement.

This raises a distinct and fundamental concern: whether prosecutorial decisions are currently being directed, negotiated or influenced by the Prime Minister, the Justice Minister and/or other elected officials – rather than made independently on the evidence and in accordance with applicable law and procedure.

Criminal charges must under no circumstances become bargaining instruments through which elected officials secure admissions, a change of lawyer or political concessions. The cabinet ministers' invocation of prosecutorial power to pressure Mr Veliaj is a matter of grave concern and an imminent threat to Mr Veliaj's fundamental rights, including his ability to receive a fair trial.

Urgent appeal

For the avoidance of doubt, we are inviting the Special Rapporteur to submit an urgent appeal to the Government of Albania.

Mr Veliaj remains at IEVP Fier while his criminal proceedings continue. The risk to him personally, and to the conduct of the criminal proceedings against him, are

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immediate. Further demands and threats directed towards Mr Veliaj or his lawyer, further coercive detention measures, or politically directed prosecutorial action are real possibilities in light of recent events.

Action requested

As it concerns Mr Veliaj, we respectfully request that you issue an urgent appeal asking the Government of Albania to:

i. Respond promptly and substantively to each of the three matters above, including the purpose and circumstances of Mr Gogu's visit to Mr Veliaj, the Prime Minister's telephone calls to Mr Ndreca, and any communications by the Prime Minister, Justice Minister or other elected officials with prosecutors concerning Mr Veliaj's case, further charges or detention;

ii. Secure a prompt, independent and impartial investigation into:

a) the circumstances and purpose of Mr Veliaj's transfer to IEVP Fier and alleged ministerial involvement in this decision;

b) potential ministerial intervention in or influence over further charges being contemplated by SPAK against Mr Veliaj; and

c) ministerial intervention in the undue pressure on and direct approaches which have been made to Mr Veliaj's lawyer, Mr Ndreca.

iii. Ensure immediate protection of the lawyer-client relationship between Mr Veliaj and Mr Ndreca, and request assurances that Mr Ndreca will be able to represent and advise Mr Veliaj without intimidation, obstruction or retaliation.

In relation to the wider implications for the independence of the judiciary, legal profession and the administration of justice in Albania, we respectfully invite the Special Rapporteur to:

i. Enquire into the adequacy and practical effectiveness of safeguards ensuring that judges and prosecutors throughout Albania discharge their functions independently, free from executive direction, political pressure or improper influence, and that lawyers can advise and represent their clients without intimidation, obstruction or retaliation;

ii. Examine whether the legal framework and general practice in Albania ensures prompt and effective independent judicial review of prison transfers, detention conditions and restrictions affecting access to legal representation or the preparation of a defence;

iii. Seek information from the Government of Albania on concrete measures taken or proposed to prevent, investigate and remedy executive interference with the judiciary, prosecution and legal profession.

These requests seek the Special Rapporteur's preventive engagement with the Albanian government in relation to Mr Veliaj's circumstances and ongoing detention,

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recognising that it is not a judicial process and that your recommendations are not enforceable orders.

We are mindful that it is not within your mandate to adjudicate the criminal allegations or substitute your assessment for that of the domestic Albanian court.

We ask you to act urgently to protect the conditions in which an independent defence, prosecution and judiciary can discharge their respective functions – free from executive interference.

Consent to non-confidentiality and further information

We are instructed that Mr Veliaj and Mr Ndreca consent to the disclosure of their names and identities to the Albanian government, other governments, intergovernmental organisations, businesses and military or security companies, for the purpose of the Special Rapporteur's actions (including any urgent appeals) arising from receipt of this submission of information. Mr Veliaj and Mr Ndreca also consent to their names appearing in a public report to the Human Rights Council.

We would be grateful for your urgent consideration. Should you require any further information, please do not hesitate to contact the undersigned submitting parties.

Yours faithfully

Mishcon de Reya LLP

Mishcon de Reya LLP

Direct Tel: [redacted]
Email: [redacted]

Kasowitz LLP

Kasowitz LLP

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This material is distributed by Kasowitz LLP on behalf of Erion and Arber Veliaj. Additional information is available at the Department of Justice, Washington, DC.

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APPENDIX

Factual background to the matter of Mr Erion Veliaj

1. Mr Veliaj is the Mayor of Tirana, the capital city of Albania. Mr Veliaj was first elected in June 2015 and re-elected in 2019 and 2023. He previously served as the Minister of Social Welfare and Youth in Albania (September 2013 to May 2015).

2. Mr Veliaj was arrested and detained on 10 February 2025, on allegations of money laundering and corruption. His detention has subsequently been authorised by successive decisions of courts of ordinary and appellate jurisdiction in Albania.

3. In October 2025, Mr Veliaj was unlawfully removed from office by the Municipality of Tirana Council of Ministers, but this decision was annulled by the Constitutional Court in November 2026 (Decision NO. 66/2025), reinstating his mandate. Mr Veliaj remains Mayor pending expiry of his term of office.

4. From 10 February 2025 until Wednesday 28 October 2026, Mr Veliaj was detained in IEVP Durrës, an open / semi-open prison (ie. low security prison).

5. On Wednesday 28 October 2026, Mr Veliaj was transferred to IEVP Fier, a closed prison (ie. higher level of security).

6. This document sets out the political context of the proceedings against Mr Veliaj, the background to the criminal proceedings and, in particular, events taking place from 28 October 2026 to date.

<u>Political context</u>

7. The development of recent events relies on the broader political context surrounding the criminal case.

8. As the incumbent Mayor of Tirana and Chair of the Socialist Party, Mr Veliaj was, prior to his arrest, widely regarded as a potential future Prime Minister. This followed a well-established trajectory from that office previously trodden by Prime Minister Edi Rama. Mr Veliaj's position is that his rising profile increasingly caused Mr Rama to view him as a threat, pointing to Mr Rama's own 2018 public remark warning that "enemy groups" within the party would "take the proper hit," and a post-arrest comment by a former Deputy Prime Minister that Mr Rama "got rid" of Mr Veliaj "as one of the people who wanted to take his place."

9. Mr Veliaj further submits that the Socialist Party's dominance of Albanian politics means that the chief threat to Mr Rama now comes from within his own party, explaining why he might target a former ally.

10. We note that Mr Rama attempted to have Mr Veliaj removed from office shortly after the arrest (a step later found to be unconstitutional) despite claiming that he would not interfere in the judicial process. Mr Veliaj also

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points to external commentary supporting an inference of political motivation, including:

- a B40 Balkans Cities Network declaration warning of a "worrying trend of politically motivated legal actions" undermining free elections, and
- a Venice Commission report on the risks that pre-trial detention of mayors poses to judicial independence and democratic governance.

11. Mr Veliaj adds that his prosecution also serves Albania's and Mr Rama's interest in demonstrating robust anti-corruption credentials as an EU candidate country.

Criminal allegations

12. The Special Anti-Corruption and Organised Crime Structure ("**SPAK**") is a specialised, independent Albanian prosecutorial and judicial body with jurisdiction over corruption, organised crime, and offences by senior officials, including mayors.

13. An anonymous complaint against Mr Veliaj was submitted on 19 July 2023; the matter was referred to SPAK on 8 February 2024 and registered as proceedings alleging passive corruption of a high-ranking official under Article 260 of the Criminal Code; Mr Veliaj and his co-accused were formally registered on 24 January 2025.

14. SPAK alleges that Mr Veliaj, as Mayor, approved the distribution of public funds (procurement contracts, concessions and building permits) to entities allegedly linked to him, which then transferred funds to NGOs, companies and individuals controlled by his wife, across five episodes:

- Episode 2 — Kontakt LLC (Fatmir Bektashi): alleged to have paid for business-class travel and accommodation for a December 2016 trip to Rotterdam, and to have made sponsorship payments to NGOs linked to Ms Xoxa;
- Episode 3 — Fusha LLC (Shkëlqim Fusha): alleged to have made €18,000 in fictitious payments for purported legal consult;
- Episode 4 — Palushi LLC (Meriman Palushi): alleged to have paid €50,000 to NGOs via fictitious invoices for an artistic festival;
- Episode 5 — Gerard-A LLC (Sokol Kryeziu): alleged to have purchased paintings at inflated prices (approximately €50,000, of which €21,000 was paid) from a gallery controlled by Ms Xoxa;
- Money laundering: SPAK further alleges that proceeds from these episodes were laundered through a network of NGOs and companies controlled by Ms Xoxa, generating revenues of approximately 110,000,000 lekë.

15. Mr Veliaj and others accused categorically deny all allegations.

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Procedural history

16. On 24 January 2025, SPAK sought coercive measures against Mr Veliaj, and by Decision No. 7, the Special Court of First Instance for Corruption and Organised Crime ("**GJKKO**") ordered preventive detention in his absence, finding (i) reasonable grounds to suspect him of the alleged offences and (ii) a risk that he would interfere with evidence, abscond and reoffend. The court also stated, unprompted, that "no remorse" had been shown by Mr Veliaj.

17. Mr Veliaj was arrested on 10 February 2025 and transferred to pre-trial detention at IEVP Durrës. After over five months of detention, he was formally charged on 23 July 2025 with passive corruption (Articles 260 and 25 of the Criminal Code) and money laundering (Article 287/2) on the basis of the five episodes set out above.

18. On 12 February 2025, Decision No. 14 of the GJKKO confirmed Mr Veliaj's continued detention after an inter parties hearing. Defence counsel was given less than half a day to review the case file which consisted of approximately 26,400 pages prior to the hearing. During the hearing, Mr Veliaj was held in a glass and steel security cage which seriously impaired his ability to effectively participate in the hearing. In the court's written decision, the judge repeated the statement that Mr Veliaj had shown "no remorse" for his offending.

19. Mr Veliaj appealed to the Special Court of Appeal for Corruption and Organised Crime ("**GJKKA**"), raising grounds including denial of adequate access to the court file, confinement in the security cage, a violation of the presumption of innocence, the improper admission of new evidence, and absence of reasonable suspicion. By Decision No. 13 (13 March 2025) the GJKKA upheld the pre-trial detention, finding that there were reasonable grounds to suspect him of having committed the alleged offences; a risk that Mr Veliaj would interfere with the evidence (based on new prison telephone intercepts), a risk of flight and risk of reoffending.

20. The GJKKA dismissed Mr Veliaj's arguments. Although it accepted the "no remorse" statement by the lower court was made in error, it held that the decision to remand in custody remained valid. Likewise, it found that the use of the glass and steel security cage was "problematic" but declined to order its removal, citing inadequate court infrastructure. Compounding the lower court's erroneous statement indicating Mr Veliaj's guilt, the GJKKA made further, unprompted remarks regarding his culpability, stating that there were "significant indications of guilt" and that Mr Veliaj's conduct had the "characteristics" of participation in a "structured criminal group", an extenuated form of criminal liability under the Albanian Penal Code that attracts a significantly increased term of imprisonment on conviction.

21. On 19 May 2025, Mr Veliaj filed his first complaint to the Criminal College of the Supreme Court. The Supreme Court considered Mr Veliaj's appeal against the decision of the GJKKA on 8 July 2025 but did not hand down its written reasons until 17 October 2025 (Decision No. 176). The Court upheld Mr Veliaj's pre-trial detention in its entirety as lawful, proportionate and correctly reasoned. The Supreme Court addressed Mr Veliaj's grounds, including absence of reasonable suspicion, denial of effective access to the case file, violation of the presumption of innocence (acknowledging the "no remorse"

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language was incorrect but did not invalidate the decision), the admission of new evidence, and the "security conditions" for detention, finding that all three conditions justifying preventative detention were met: the risk of evidence tampering, the risk of flight, and the risk of reoffending.

22. One month later, on 21 November 2025, Mr Veliaj filed a constitutional complaint challenging the decisions of the lower, ordinary or GJKKO courts and the Supreme Court to continue with the security measure of pre-trial detention and reject all his other grounds of appeal. Mr Veliaj applied for expedition on 1 December 2025, which was granted on 26 January 2026. Mr Veliaj's grounds included inadequate reasoning of the proportionality of his pre-trial detention, insufficient time to review the case file, his confinement in the glass and steel security cage, the improper admission of new evidence, and the use of language in the decisions of the lower courts that undermined the presumption of innocence.

23. By Decision No. 57 (25 May 2026, pronounced 1 July 2026), the Constitutional Court partially granted Mr Veliaj's application, and annulled Supreme Court Decision No. 176 for inadequate reasoning on the proportionality issue (including the right to stand for election) and for failing to address the dignity/presumption-of-innocence grounds arising from his detention in the security cage, while declining to annul the lower courts' decisions on the grounds of appeal which are the subject of this application.

24. Accordingly, the Constitutional Court found the other grounds of appeal (absence of reasonable suspicion, violation of the presumption of innocence, denial of access to the case file, and the security cage's adverse effect on communication with counsel) inadmissible or unfounded, with significant dissents from several judges, and found no majority on the *reformatio in peius* claim, which was accordingly dismissed.

25. On 29 October 2026, this Firm submitted an application to the European Court of Human Rights in Strasbourg, alleging the following Convention violations:

- **Article 5 § 1(c):** absence of reasonable suspicion;
- **Article 5 § 4:** denial of opportunity to effectively challenge the lawfulness of the applicant's detention;
- **Article 5 § 4:** speedy determination of the lawfulness of continued detention;
- **Article 6 §§ 1 and 3(b) and (c):** effective participation in the proceedings;
- **Article 6 § 2:** presumption of innocence; and
- **Article 18:** criminal proceedings and pre-trial detention are for an ulterior purpose.

<u>Events from 28 October 2026 onwards</u>

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26. Three recent events in Mr Veliaj's case are cause for significant concern in relation to his safety and ability to enjoy and exercise his fundamental rights whilst in pre-trial detention.

27. In summary, Mr Veliaj has been transferred to a higher-security prison for reasons which have been withheld "for security reasons". Mr Veliaj understands that his transfer has been ordered because of a social media post published on his behalf on 26 October 2026, in which Mr Veliaj expressed support for student protests taking place in Belgrade, Serbia.[1] Mr Veliaj's position is that the pro-protest stance taken in his Instagram post has lead to the foregoing events and the circumstances in which Mr Veliaj finds himself today:

Prison transfer of Mr Veliaj

28. On Wednesday 28 October, Mr Veliaj was moved from IEVP Durrës (a low-to-medium security prison) – where he had been in pre-trial detention since 10 February 2025 – to IEVP Fier (a high-security prison). Mr Veliaj has described his transfer in a letter to the GJKKO as follows:

"On Wednesday of last week I was abducted by an escort platoon without being shown the secret order explaining why I was being moved, where I was going, or how it was justified to move me a further 100 km away from the Court where I am being tried, from my family with two minor children and my pensioner mother, and from the Municipality of Tirana, which I lead."

29. Mr Veliaj's whereabouts and transfer were not notified to his family until 30 October 2026.

30. Due to numerous concerns raised by Mr Veliaj, his lawyer, his family members and Albanian media regarding the unconventional circumstances of his transfer, the Albanian Helsinki Committee ("**AHC**") conducted a visit to Mr Veliaj at IEVP Fier on Friday 30 October.[2] The concerns leading to this visit were based on the following:[3]

- That Mr Veliaj was given no prior notice of his transfer to IEVP Fier on 28 October;
- That Mr Veliaj was transferred without being provided with the basis for his transfer or any supporting documents;
- That, when Mr Veliaj was informed of the intention to transfer him, he was initially not told which institution he was being transferred to; and
- That Mr Veliaj has been told by the Albanian Minister of Justice, Toni Gogu, that he was transferred as punishment for allegedly "encouraging" protests.

[1] See enclosed original Albanian and English machine translation of an Instagram post of Erion Veliaj on 26 October 2026.
[2] See enclosed report of the Helsinki Committee dated 2 November 2026.
[3] See enclosed declaration and letter from Mr Veliaj to Judge Ulliri dated 2 November 2026.

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31. We note in particular the AHC's comments in its report on the decision to withhold the reasons for Mr Veliaj's transfer:

"One of the main concerns relates to the transfer order, which the AHC's monitor was able to inspect only briefly. The document stated the reason for Veliaj's transfer in general terms as "for security reasons", while the order bore the classification "restricted", for a period of up to two years.

The AHC considers that, although transfers for security reasons are provided for by law, the decision must be based on specific, documented circumstances. In its view, the document's classification should not prevent the detainee from being informed of the essential reasons for the decision and challenging it in court." (emphasis added)

"The AHC considers that transfer for security reasons is a measure provided for by legislation, but its use must be based on specific, documented and verifiable circumstances."

"Law No. 81/2020 recognises the right to challenge decisions of prison authorities in court. This right risks remaining merely formal if the person is unaware of the essential content of the decision and the reasons for it."

32. The AHC's report also raises concerns about Mr Veliaj's inability to make telephone calls to family members for an extended period subsequent to his transfer, in violation of his rights:

"The AHC notes that Law No. 81/2020 guarantees a pre-trial detainee's right to inform their family immediately of their transfer and whereabouts. Restrictions on communications must have a legal basis and comply with the relevant procedural safeguards.

Administrative or technical delays must not, in practice, impose restrictions on rights that are not provided for by law.

In this case, an explanation is required as to why continuity of communications through the numbers previously approved by Durrës IEVP was not ensured."

33. After his transfer on 28 October, Mr Veliaj's access to telephone calls was only restored a week later – on 3 November.

34. Further concerns were raised in the AHC's report regarding: (a) the management of Mr Veliaj's healthcare plan and medical records in the circumstances of his transfer; (b) conditions of his prison cell; (c) the necessity of a further risk assessment given Mr Veliaj's concerns for his personal safety; and (d) the proportionality of the decision to transfer Mr Veliaj further from his family members and lawyer.

Justice Minister's visit to Mr Veliaj at IEVP Fier

35. On Friday 30 October at around 22:30 in the evening, Mr Veliaj received a private visit from the Albanian Minister of Justice, Toni Gogu, at IEVP Fier.

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36. A contemporaneous handwritten note of the meeting produced by Mr Veliaj is enclosed. In addition to the contents of Mr Veliaj's note, we have been made aware of a number of features of Mr Gogu's visit which are highly concerning:

- Mr Gogu's visit was not recorded in the IEVP Fier prison logbook;
- Mr Gogu was dressed casually and wearing a cap during his visit to Mr Veliaj, which Mr Gogu purports took place in an official capacity;
- Mr Gogu attended Mr Veliaj in his private prison cell;
- Mr Gogu attended IEVP Fier on instruction of the Prime Minister, Mr Rama.

37. We understand the following in relation to demands made by Mr Gogu on behalf of Mr Rama: [4]

- Mr Veliaj was instructed to admit his involvement with the "Flamingo" student movement. If Mr Veliaj refused to do so, then additional charges of "undermining the constitutional order" from prison will be brought against Mr Veliaj, and as a consequence Mr Veliaj will be made to serve 100 years in IEVP Jordan Misja (ie. high-security prison 313) and IEVP Mine Peza (ie. high-security prison 302);[5]
- Additionally, Mr Veliaj was instructed to resign as mayor of the municipality of Tirana and delegate his mandate to an individual of his choosing (being Mr Arbër Hajdari);
- Mr Veliaj was also instructed to stop consulting with and using Mr Plarent Ndreca as his lawyer.

38. Mr Gogu has since publicly confirmed that he visited Mr Veliaj at IEVP Fier in the late evening of 30 October. However, he has denied the substance of this visit.[6]

Direct approaches to Mr Veliaj's lawyer

39. Over a period of weeks, Mr Rama – the Albanian Prime Minister – has made repeated direct phone calls to Mr Veliaj's privately instructed lawyer, Mr Plarent Ndreca. We refer to a note from Mr Ndreca which summarises the timing and content of these phone calls.[7]

40. In summary, Mr Ndreca has received phone calls from Mr Rama in which he has been admonished for his representation of and advice to Mr Veliaj. Mr Rama has been increasingly persistent in his pursuit of Mr Ndreca. We note

[4] See enclosed Facebook post of Erion Veliaj on 2 November 2026.
[5] For the avoidance of doubt, Mr Veliaj denies any involvement (whether in organising or financing) with the Albanian student-led "Flamingo" movement.
[6] See enclosed Facebook post of Toni Gogu on 2 November 2026.
[7] Statement of Plarent Ndreca regarding calls with Edi Rama from 10 October to 2 November 2026.

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that, on 2 November, Mr Ndreca received three calls from Mr Rama, one of which was a missed call.

41. Mr Rama's direct approaches to Mr Veliaj's lawyer is directly relevant to a highly concerning fact pattern which has developed in a short period of time, involving aggressive and threatening ministerial interference in the criminal justice system.

Hearing dated 3 November 2026

42. In the morning of 3 November, a hearing took place at the GJKKO. Ahead of this hearing, Mr Veliaj wrote a letter to the judge, Ms Ulliri, setting out the same events described in this letter. This letter is enclosed.[8]

43. Mr Veliaj's lawyer, Mr Ndreca, attended this hearing in spite of the aggressive phone calls he has received from Mr Rama attacking his continued representation of Mr Veliaj.

44. At this hearing, we understand that the Court determined that the Directorate of Prisons had failed to notify it of Mr Veliaj's transfer, despite being legally required to do so. Regrettably, this determination does not resolve the broader question of the transfer's legality. The Court noted that an investigation of this violation fell outside of its jurisdiction, and therefore advised Mr Veliaj's defence team to pursue the appropriate legal channels for challenging this.

45. As at the date of this letter, Mr Veliaj remains in custody at IEVP Fier in Albania.

46. Enclosures in support of the background set out herewith are as follows:

i. Original Albanian and English machine translation of an Instagram post of Erion Veliaj on 26 October 2026;

ii. Albanian Helsinki Committee report dated 2 November 2026 at 09:30;

iii. Facebook post on behalf of Erion Veliaj published on 2 November 2026;

iv. Facebook post of Toni Gogu published on 2 November 2026;

v. Statement of Plarent Ndreca regarding calls with Edi Rama from 10 October to 2 November 2026;

vi. Copy of letter from Erion Veliaj to the GJKKO judge, Ms Ulliri, dated 2 November 2026.

[8] See enclosed declaration and letter from Mr Veliaj to the GJKKO judge, Ms Ulliri, dated 2 November 2026.

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