

ANNUAL REPORT 2025



CONSTITUTIONAL
COURT



**ANNUAL REPORT
2025**

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CONSTITUTIONAL COURT

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Message from the President of the Constitutional Court, Ms. Fiona Papajorgji



I am pleased to share with you the achievements of the Constitutional Court of Albania during 2025, as well as the challenges that accompanied its work.

The Constitutional Court exercised its functions within a legal and institutional context characterized by the complexity of constitutional cases, their growing number, and the high expectations placed upon the Court to ensure a stable and reliable system of constitutional justice.

During 2025, the Court delivered 429 reasoned decisions, of which 85 were final judgments, 316 were inadmissibility decisions issued by the panels, and 28 were inadmissibility decisions issued by the Meeting of Judges. Nevertheless, beyond these figures, the work of the Constitutional Court acquires its true significance when it has a tangible impact on the lives of individuals and contributes to safeguarding the rule of law.

The cases examined addressed matters of particular importance for the constitutional order, including the functioning of public authorities, the mandates of local government bodies, the renewal of the Constitutional Court's composition, and the effective protection of fundamental human rights.

The new and complex challenges arising from the continuous development of society have also become part of constitutional jurisprudence. These have included issues related to technological developments and the need to regulate digital platforms, the balancing of freedom of expression with the public interest, and the protection of the environment and protected areas.

The Constitution embodies a system of values centered on human dignity. In this regard, the Court has sought to further consolidate the emerging dimension of constitutional jurisprudence relating to the substantive review of fundamental rights and freedoms. Within this

framework, safeguarding human dignity and expanding citizens' access to the Court through the individual constitutional complaint remain key priorities.

I would also like to place particular emphasis on the quality of constitutional reasoning and the consolidation of jurisprudence, as the Court's decisions serve not only to resolve specific disputes, but also to provide guidance for state institutions, courts, and society at large. In this respect, the Court has focused on strengthening its capacities in legal research and reasoning, while also seeking to further develop constitutional dialogue by drawing on the principles of comparative law and international judicial practice, with a view to enriching constitutional analysis.

During 2025, notable progress was also achieved in enhancing transparency, fostering open communication with the public, and ensuring the systematic publication of the Court's decisions and their summaries. These achievements are the result of the sustained commitment and dedication of the judges, legal advisers, and the administration of the Constitutional Court, whose efforts have contributed significantly to the fulfilment of the institution's constitutional mission and functions.

Judicial dialogue and solidarity have also remained central priorities for the Constitutional Court of Albania. In this regard, I would like to emphasize that 2025 marked a particularly significant moment for the Court in its capacity as the Presiding Court of the Conference of European Constitutional Courts (CECC) for the period 2024–2027. In this framework, the Court hosted in Tirana, on 28 February 2025, the Preparatory Meeting of the Circle of Presidents of the CECC.

Throughout its work in 2025, the Constitution-

al Court has not stood alone. I would therefore like to express my particular gratitude to our international partners for their continuous support and constructive cooperation. Their contribution has been instrumental in strengthening institutional capacities, advancing constitutional jurisprudence, facilitating the exchange of professional experience with peer constitutional courts, and promoting working standards in line with European and international best practices.

Considering this report as a window for communication and dialogue with legal professionals, as well as with the broader public, I reiterate my personal commitment, as President of the Constitutional Court, to safeguarding the constitutional order and upholding the fundamental values of democracy and human dignity.

The Court, fully aware of the challenges that lie ahead and firmly committed to supporting Albania's path toward European values, will continue to protect the Constitution and strengthen constitutional democracy, so that the spirit of the Preamble of the Constitution remains alive in its determination "*...to build a democratic and social state governed by the rule of law, and to guarantee fundamental human rights and freedoms...*".

With the commitment that this window of dialogue and communication will be further strengthened in the months to come, I hope that 2026 will be a year in which constitutional justice becomes more effective and more credible, and that the Court will continue to fulfil the purpose entrusted to it by the framers of the Constitution, that of serving as its faithful guardian.



A year of achievements and challenges

The year 2025 marked an important stage in the consolidation of the Constitutional Court's jurisprudence, particularly in the adjudication of constitutional disputes between branches of power, the review of the constitutionality of laws, and the effective protection of the individual's fundamental rights and freedoms.

The number of applications submitted to the Court, particularly individual constitutional complaints, continued to increase during the year. This trend reflects both the growing public confidence in the guarantees of constitutional justice and the strengthening recognition of the Court's role as a guardian of the constitutional order and the protection of fundamental human rights.

During 2025, the Court issued a total of 429 reasoned decisions. Despite the considerable caseload, the Court remained committed to respecting the statutory time limits for judicial review, while placing particular emphasis on the quality of its reasoning, and on the coherence and consistency of constitutional standards.

Strengthening the Constitutional Role and Institutional Integrity

During 2025, the Constitutional Court continued to consolidate its role as a guarantor of the constitutional order and of the balance between the branches of power, in accordance with the principles of the rule of law. The Court's institutional activity was directed toward achieving its strategic objectives aimed at ensuring a functional, stable, and integrity-based system of constitutional justice, while further strengthening the standards of insti-

tutional governance. Within this framework, periodic assessments of the Court's work and discussions on strategic planning served as important mechanisms for reflecting on achievements and challenges, thereby ensuring continuity and coherence in institutional policies and in the Court's long-term development.

Advancing and Consolidating Constitutional Jurisprudence

The Court continued to pursue its strategic objectives by intensifying its efforts to guarantee a functional and independent system of constitutional justice. A central priority of its activity has been the consolidation of interpretative standards in line with the fundamental principles of the Constitution. The constitutional jurisprudence of 2025 reflects a consistent orientation toward strengthening the rule of law, reinforcing the balance between the branches of power, and ensuring the effective protection of fundamental rights and freedoms.

Through the examination of individual constitutional complaints, the Constitutional Court has continued to develop and consolidate constitutional standards in several key areas concerning fundamental rights and freedoms. Some of the most notable decisions, introducing important developments in judicial practice, have addressed issues such as the freedom of expression, the protection of private

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life and personal data, the inviolability of home and professional premises, property rights, and the guarantees of due process.

In these cases, the Court has reaffirmed its role as a guarantor of the balance between the public interest and individual rights, while further developing the principles of proportionality and effective judicial review. In doing so, it has emphasized that arbitrariness in judicial decision-making is incompatible with the concept of a fair trial as enshrined in Article 42 of the Constitution. At the same time, the Court has strengthened the harmonization of national jurisprudence with the standards of the European Court of Human Rights, while promoting its role as a guarantor of the effective constitutional protection of the individual.

▀ Contribution to Constitutional Culture

One of the most significant achievements of 2025 was the continuation of efforts to systematize and enhance the accessibility of constitutional jurisprudence. The publication of the “Guide to the Jurisprudence of the Constitutional Court – Volume II” represents an important step in this direction, summarizing and analyzing the standards developed by the Court in relation to constitutional principles, fundamental rights and freedoms, and the separation and balancing of powers.

This publication serves as a valuable reference resource of particular practical and academic significance for judges, lawyers, legal advisers, scholars, and law students. By facilitating legal research, it also contributes to greater coherence in constitutional practice. This Guide constitutes an important contribution to strengthening the Court’s educational role in the development of constitutional doctrine and legal culture in the country, while further bringing national standards closer to European and international ones.

▀ Transparency, Accessibility, and Citizen-Oriented Engagement

Enhancing institutional transparency and public access to constitutional justice remained one of the Court’s key priorities throughout 2025. In this context, the Court sought to reinforce its role as an open and citizen-oriented institution by implementing concrete initiatives aimed at expanding public access to information and to its judicial practice.

Through the timely publication of decisions, announcements, and information on plenary hearings on its official website, the Court continued to ensure clear and accessible information for both the public and legal professionals. The live streaming of public hearings, together with the use of digital communication channels, further contributed to strengthening transparency and fostering public trust.

At the same time, the organization of press conferences on the day the operative parts of decisions were announced enabled more direct and accessible communication of the Court’s constitutional decision-making.

The publication of the Court’s electronic bulletin of decisions was further consolidated during 2025. This publication has evolved into a stable and reliable informational tool, enhancing the predictability of judicial practice and facilitating broader awareness of constitutional standards.

▀ Institutional Modernization and Enhanced Organizational Efficiency

In response to the growing number and increasing complexity of cases addressed to it, the Constitutional Court placed particular emphasis on modernizing its working processes

To download the Guide, please visit the Constitutional Court’s website at the following link: [Guidelines](#), or scan the QR code.



and improving organizational efficiency. Periodic assessments of the Court's institutional activity served to identify operational needs and to adapt internal structures to the evolving demands of the Court's functioning.

Against this background, cooperation with international partners was further strengthened with a view to establishing a modern case management system and digitizing the Court's archive. This initiative is expected to improve internal organization, operational efficiency, and institutional transparency in the years ahead.

The Court also attached particular attention to strengthening the professional capacities of its administration, especially the Legal Service Unit, which serves as the Court's principal legal research body, providing advisory and analytical support to the Court's decision-making process. In light of the increasing complexity of constitutional cases and the expanding scope of substantive review of fundamental rights, the Court remains committed to continuously enhancing research and analytical capacities and to updating the professional knowledge of legal advisers, in line with developments in the constitutional jurisprudence of other European countries and the case law of the European Court of Human Rights.

Cooperation with International Partners

During 2025, cooperation with international partners continued to represent one of the most important dimensions of the Constitutional Court's institutional activity, contributing to the achievement of its strategic objectives and to the further improvement of the quality of constitutional jurisprudence.

With the support of the OSCE Presence in Albania and the Konrad Adenauer Foundation, the Court finalized and published the second Guide to the jurisprudence of the Constitutional Court, thereby enhancing the accessibility and systematization of constitutional practice. In cooperation with the IRZ Foundation, study visits and professional seminars on the individ-

ual constitutional complaint were organized, contributing to the exchange of professional experiences and to the strengthening of institutional capacities.

Furthermore, in partnership with the Council of Europe, efforts were initiated to establish a modern case management system and to digitize the Court's archive, with the aim of enhancing institutional efficiency and transparency.

The institutional activity of 2025 reflects the Constitutional Court's steady development, oriented toward institutional strengthening and modernization in line with European standards of constitutional justice, as well as toward the further expansion of international cooperation.

Judicial Dialogue and International Engagement

At the international level, in 2025 the Constitutional Court demonstrated a strong and sustained commitment to the regional and global community of constitutional justice, actively exercising its role as the presiding court of the Conference of European Constitutional Courts (CECC) for the period 2024–2027. Within the framework of this presidency, a particularly significant milestone was the organization in Tirana, on 28 February 2025, of the Preparatory Meeting of the Circle of Presidents of the CECC, one of the Conference's principal governing and decision-making bodies. During this meeting, key decisions were taken regarding the organization of the forthcoming XXth Congress of the CECC, which will be hosted in Albania in 2027.

A development of particular institutional and historical significance was also the approval, by a majority of CECC member courts, of the re-

 To visit the Constitutional Court's YouTube channel, please refer to the following link: [YouTube - Constitutional Court](#), or scan the QR code.



quest submitted by the Constitutional Court of Kosovo for full membership in the Conference.

Another important dimension of the Constitutional Court's international engagement during 2025 was its active participation within the framework of the World Conference on Constitutional Justice (WCCJ) and the Association of Francophone Constitutional Courts (ACCF). In October 2025, in Madrid, the Constitutional Court of Albania, acting in its capacity as the presiding court of the CECC, chaired the meeting of the CECC regional group, which preceded the VIth Congress of the World Conference on Constitutional Justice. On that occasion, the Court also represented the European constitutional courts within the Bureau of the World Conference, addressing their views and priorities on issues of global importance.

Furthermore, in 2025 the Constitutional Court of Albania was elected for the first time as a member of the Bureau of the Association of Francophone Constitutional Courts during the Xth Congress of the ACCF held in Bucharest. This development further enhanced the Court's international profile and reaffirmed the confidence of the Francophone and global constitutional community in its contribution to the promotion of constitutional justice, the protection of human rights, and the rule of law.

The Court remains committed to further advancing international judicial dialogue and continuing the exchange of best practices with peer courts, recognizing such cooperation as a valuable source for improving constitutional standards and promoting the integration of European constitutional values.

Despite the positive developments and achievements recorded in 2025, the activity of the Constitutional Court was also accompanied by a number of challenges that required a careful, balanced, and professionally grounded approach. The continued increase in the number of individual constitutional complaints, together with the growing complexity of cases concerning disputes between the branches of

power, constitutional review of legislation, and the protection of fundamental rights, has required a higher level of analytical engagement and the use of increasingly sophisticated legal methodologies.

This dynamic requires not only adequate human and logistical resources, but also innovation in the organization of work and in research support, so as to ensure that the quality of judicial decision-making remains aligned with the highest constitutional and European standards.

At the same time, rapid social and technological developments, as well as evolving European standards in the field of human rights, require the continuous refinement of interpretative approaches and the adaptation of jurisprudence to emerging constitutional challenges. These developments are closely linked to another important challenge: the growing expectations of institutional actors and, in particular, of the public for timely and effective decisions in matters that often have direct social, economic, or political implications.

In such a context, the Court has been required to maintain a careful balance between the demand for efficiency and the obligation to conduct thorough and impartial review, while avoiding any perception of external influence on the decision-making process.

In addressing these challenges, the Constitutional Court of Albania remains aware that preserving constitutional authority and public trust requires institutional restraint, prudence in communication, and consistency in jurisprudence. For these reasons, the Court's priorities for 2026 aim at further consolidating its role as the guardian of constitutionality, strengthening public confidence, and continuously adapting its activity to emerging institutional and societal challenges.



To follow the Constitutional Court's international engagements and cooperation activities, please refer to the following link: [Official Meetings Abroad](#), or scan the QR code.





REPUBLIKA E SHQIPERISE
GJYKATA KUSHTETUESE

2025 in metrics

501

applications registered

An increase of **17%** from **2024**

429

reasoned decisions

71% of the registered applications

85

final decisions or **20%** of the decision-making

316

inadmissibility decisions from the Chambers

or **74%** of the decision-making

28

inadmissibility decisions from the Meeting of Judges

or **6%** of the decision-making

To download the statistical data for 2025, please refer to the following link: [Statistical Data](#) or scan the QR code:



8
months

Average Duration of Case Examination for
Decisions on the merits

3
months

Average Duration of Case Examination for
Inadmissibility Decisions

The Court has respected the procedural deadlines for reviewing applications, in accordance with the provisions of the Court's Organic Law, as well as the Rules on Judicial Procedures of the Constitutional Court.

There is no case unduly prolonged or backlogged.

Also, it is worth noting that no request for delays of proceedings has been filed with the Constitutional Court.

Services to the Public



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Visits **22,892**

Impressions **146,290**

Youtube

Visits **56,244**

Impressions **354,786**

Subscribers **413**

Watch time **11,289**

(hours in total)

Facebook

Visits **47,200**

Followers **898**

Interactions **1,100**



Linkedin

Impressions **129,818**

Followers **3,904**

Interactions **2,489**



X

Impressions **423**

Followers **136**

Interactions **22**



Publications

6 periodic bulletins

1 guideline

27 press releases



To download publications for 2025, please refer to the webpage of the Constitutional Court by following the link [Publications](#) or scan the QR code





Composition of the Constitutional Court

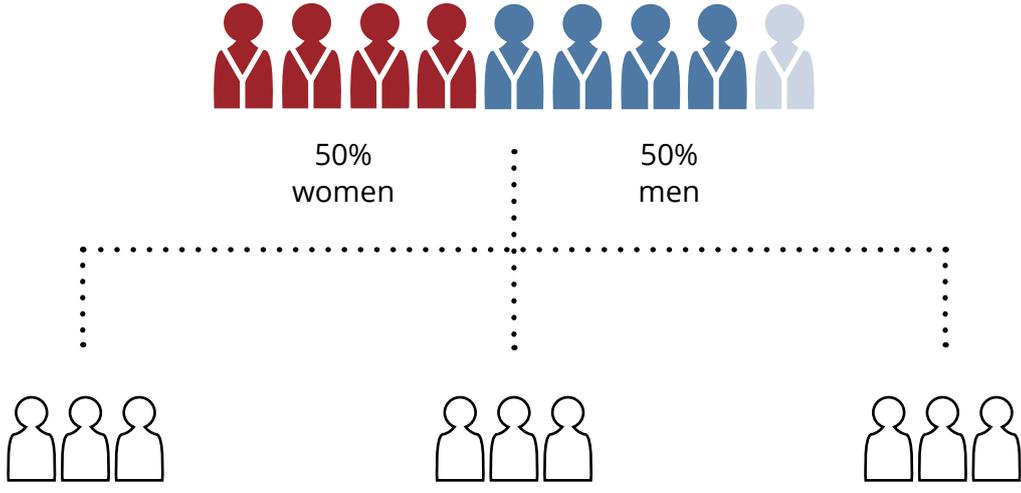
According to the Constitution, the Constitutional Court is composed of 9 members. Three members are appointed by the President of the Republic, three are elected by the Parliament, and three are elected by the High Court. Judges of the Constitutional Court serve a 9 years term, without the right to reappointment.

 *November 2025*
A new judge is appointed

 *December 2025*
New Chair unanimously elected

During 2025, the Constitutional Court operated with 8 constitutional judges, therefore functioning with an incomplete composition compared to the nine members stipulated by the Constitution.

Nevertheless, the Court managed to ensure the continuity of institutional functioning and the effective exercise of its constitutional competences, guaranteeing the decision-making process and the review of cases of constitutional significance.”



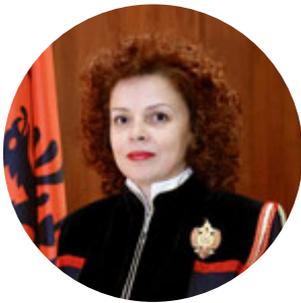


For the biographies of the members of the Constitutional Court, please refer to the website at the following link: [Composition- Constitutional Court](#) or scan the QR code





Dr. Fiona Papajorgji,
President of the Constitutional Court
Elected by the Parliament, November 2019



Marsida Xhaferllari,
Member
Elected by the President of
the Republic, November 2019



Sonila Bejtja,
Member
Elected by the President of
the Republic, December 2020



Dr. Sandër Beci,
Member
Elected by the High Court,
March 2022



Ilir Toska,
Member
Elected by the High Court,
September 2022



Gent Ibrahimimi,
Member
Elected by the President of the
Republic, December 2022



Prof. Dr. Marjana Semini,
Member
Elected by the Parliament,
December 2022



Dr. Asim Vokshi,
Member
Elected by the High Court,
November 2025

Organisational structure and budget

The approved organizational structure includes **88** employees in total



Secretary General



Cabinet



Legal Services Unit



Judicial and Documentation Directorate



Office of the Internal Auditor



Directorate of Legal Services, Procurement, and Information Technology



Directorate for Public and International Relations



Directorate of Finance, Human Resources, and Support Services

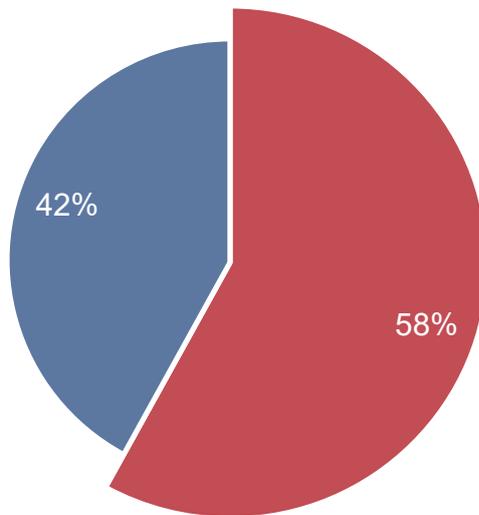


Directorate of Research, Studies, and Publications

In **2025, 81%** of the organizational structure was staffed



71 full time employees



■ Women ■ Men



The budget allocated during **2025** amounts to **264,032,336 ALL**, representing a **14% decrease** compared to **2024**

Constitutional jurisprudence in focus

SELECTED CASES



Compatibility of laws with the Constitution

Freedom to practice the medical profession

 Judgment No. 58, dated 15.10.2025

 Trade Union of Health Service Employees, Order of Physicians of Albania

The autonomy and independence of the Order of Physicians does not preclude the State to exercise its supervisory powers in spheres concerning the public interest.

The very balance between the public interest to guarantee the highest health standards and the individual right to exercise the profession is safeguarded through compliance with the physician's obligations vis-à-vis the public institution and the rules concerning conflict of interest, without the need for prior authorization from the head of the institution.

Any interference affecting the exercise of the right to practice a profession must be based on clear, accessible, and predictable norms, in order to enable the individual (the physician in the instant case) to know in advance the disciplinary consequences of his actions or omissions.

Facts

The Assembly enacted Law No. 123 of 25 September 2014 "On the Order of Physicians in the Republic of Albania", and subsequently, the Council of Ministers enacted Normative Act No. 2/2024 "On some amendments and additions to Law No. 123/2014 'On the Order of Physicians in the Republic of Albania'". By Law No. 94/2024, the Assembly enacted the normative act having the force of law. The amendments concerned the powers of the Order of Physicians, the criteria for and termination of membership, the obligations of its members, the conditions for practicing the profession, the bodies of the Order, the responsibilities of the National Council, the functions of the regional councils, the disciplinary committees, disciplinary measures and judicial appeal, as well

as the competence of the National Council regarding the Code of Ethics and Medical Deontology. Council of Ministers Decision No. 85 of 05 February 2025, "On the composition, organization and functioning of the Disciplinary Commission and the Appeal Commission", laid down the rules regarding the composition, organization, and functioning of the Disciplinary Commission and the Appeal Commission, the conduct of a fair trial for the examination of claims of disciplinary offences, and the adoption of disciplinary measures applicable to physicians practicing in public and non-public health institutions in the Republic of Albania. The Trade Union lodged an application with the Court seeking the repeal of the normative act or, in the alternative, the repeal of specific articles thereof, or a declaration of a legislative omission regarding the possibility for physicians employed in hospital structures possessing full financial autonomy to choose between a full-time or part-time employment relationship, as well as regarding the entitlement to supplementary payment for physicians opting for an exclusive employment relationship with a public hospital structure. The other applicant, namely – the Order of Physicians, lodged an application with the Court seeking the repeal of the normative act and of the Council of Ministers Decision No. 85. Therefore, the Meeting of Judges decided on the joinder of the cases.

Court's Assessment

Regarding the principle of the rule of law – The Court has stated that the State exercises its functions not only through its institutions but, to a certain extent, also through other non-public entities which are entrusted by law with specific public functions. Although the Order of Physicians is a legal entity governed by public law and established by law, it exercises powers that have a direct impact on the fulfilment of the state social objectives in the sphere of healthcare. This implies that it performs functions of a public nature, and consequently, a system of self-regulation and self-governance must be guaranteed in its regard. The Court holds that the involvement of the competent ministry in the organization and operation of the disciplinary com-

missions of the Order of Physicians, as well as in the approval process of the Code of Ethics, constitutes a reasonable and proportionally justified measure of state interference. This form of interference is grounded in the public of Physicians. Such involvement does not impair the functional independence of the Order but seeks to strike a balance between professional autonomy and public accountability in safeguarding the public interest. Thus, the Court concludes that the institutional framework established under the challenged normative act does not amount to an unjustified interference with the autonomy of the Order of Physicians. Rather, it functions as a supervisory mechanism intended to fulfil the state's constitutional duties in ensuring the high standards of healthcare. In this context, the Court finds the applicant's claims of a violation of the principle of the rule of law to be ill-founded.

Freedom of economic activity in relation to the principles of proportionality, equality before the law, and principle of non-discrimination

Regarding the 30% limitation on monthly working hours – The Court, in respect of this claim of the applicants, did not reach the required majority for a decision following the deliberations. Therefore, the claim for a violation of the freedom of economic activity due to the imposition of the 30% limitation on monthly working hours is dismissed.

Regarding the obligation to seek authorization from the competent authority to practice the medical profession in a non-public healthcare institution – The Court emphasizes that, insofar as the exercise of professional activity in a non-public healthcare institution does not impede the performance of duties within the public institution and does not give rise to a conflict of interest, there are no constitutional grounds to make such activity conditional upon the granting of an administrative authorization. The absence of an obligation to provide a reasoned decision and the lack of an effective remedy render the authority competence discretionary, and hence fails to provide the necessary procedural safeguards. Furthermore, the Court finds that the restriction imposed by such provision fails to satisfy the requirement of proportionality between the public interest of guaranteeing the highest health standards and the freedom to practice the medical profession by physicians. On the one hand, the law provides for the possibility of dual employment for physicians, while on the other hand, it confers upon

the competent authority a discretionary power that, in practice, renders the exercise of such right elusive.

The requirement to obtain prior authorization from the competent authority is of such a nature that, in practice, it may lead to the complete deprivation of the right to practice the profession in the non-public healthcare sector, thereby rendering such restriction disproportionate in relation to the legitimate aim pursued. Thus, the Court finds that the applicants' claim regarding a violation of their freedom of economic activity is well-founded.

Regarding the violation of the right to work and to exercise a profession in relation to the principle of proportionality – The Court considers that such provision fails to meet the standard of clarity and predictability of the law. The amended wording of Article 17 of Law No. 123/2014, insofar as it provides for the disciplinary measure of revocation of the professional license, does not satisfy the constitutional standard of clarity and predictability. Furthermore, the Court finds that – the inclusion in the normative act of the disciplinary measure of permanent license revocation, without specifying clear and precise criteria governing its application, exceeds the nature of a penal sanction and thus, it inherently violates the right to work and to practice a profession. In this regard, the applicants' claim is deemed to be well-founded. Therefore, the Court holds that letter "d" of paragraph 1 of Article 17 and the final sentence of paragraph 3 of the same Article, as amended by Article 10 of the normative act, shall be repealed.

Regarding the claim of a violation of Article 101 of the Constitution – With respect to the claim concerning the violation of Article 101 of the Constitution, on grounds that the normative act was enacted in the absence of the requisite conditions of necessity and urgency, the Court, following deliberations, did not reach the required majority for a decision. Therefore, the Court decided to reject such claim.

The Court decided, by majority vote, to accept the application in part.



To consult and download the full judgement, please follow the link [Judgement in PDF](#) or scan the QR code



Conflict of competences between the branches of power

Conflict of competences between a group of not less than one-tenth of MP-s and the Assembly

 Judgment No. 35, dated 27.05.2025

 A group of not less than One-tenth of the Members of Parliament)

The Speaker of Parliament or one-tenth of MP-s are the entities empowered by law to initiate a parliamentary motion to review the incompatibility of a MP's mandate, whereas the Assembly is the entity responsible for referring the matter to the Constitutional Court.

If such a motion is rejected, the right of one-fifth of members of parliament is triggered to set into motion constitutional judicial review for an examination of the merits of the case.

The request does not constitute a conflict of competences within the meaning of constitutional standards. Instead, it raises a constitutional dispute concerning the incompatibility of the Member of Parliament's mandate.

Facts

Fourteen MP-s of the Democratic Party submitted a motion to the Assembly to initiate parliamentary proceedings for finding of incompatibility and termination of the mandate of the Member of Parliament Vullnet Sinaj, and to refer the motion to the Constitutional Court. They claimed that during his mandate (regarding the period 2017–2024), the MP, through his companies, obtained income from the state budget in violation of Article 70(3) of the Constitution. Reports from the parliamentary majority and minority were presented during the meetings of the Rules of Pro-

cedure Committee. The Parliament decided not to refer the motion – supported by a group of not less than one-tenth of MP-s, to the Constitutional Court. Subsequently, the applicant lodged an application with the Court to resolve the relevant conflict of competences with the Parliament, as well as to repeal the latter's decision.

Court's Assessment

On the Court's Jurisdiction - When the Parliament is set into motion by a group of not less than one-tenth of deputies or its Speaker, it has a constitutional obligation to initiate parliamentary proceedings to examine the motion for referring the issue of mandate incompatibility to the Court. If the motion is rejected, the alternative mechanism to trigger constitutional review – under Article 131(1)(e) of the Constitution – is the submission of an application of a group of not less than one-fifth of MP-s, as stipulated in Article 134(1)(c) of the Constitution and reflected in Article 66(2) of Law No. 8577/2000.

In the case at hand, albeit the applicant formally sought resolution of the conflict of competences between himself and the Parliament, inherently, such application concerns the incompatibility of the Member of Parliament's mandate (Vullnet Sinaj) under Article 131(1)(e) of the Constitution. Therefore, the applicant (one-tenth of MP-s) lacks standing (*locus standi*) to directly set into motion the Court for resolution of the relevant constitutional dispute, i.e., for declaration of incompatibility of the Member of Parliament's mandate (Vullnet Sinaj).

The Court decided to reject the application.



To consult and download the full judgement, please follow the link: [Judgement in PDF](#) or scan the QR code



Conflict of competences between the branches of power

Duration of the constitutional judge term of office and the partial periodic renewal of the composition of the Constitutional Court

 Judgment No. 60 dated 16.10.2025

 The President of the Republic of Albania

Although the mandate of a constitutional judge has the meaning of a granted mandate, the principle of independence also implies that, at the moment of appointment, the judge must know the duration of this mandate, and this duration cannot be left to the discretion of the bodies that have appointed/elected him or her.

The Court emphasizes that the principle of the renewal of the composition of the Constitutional Court prevails over that of the irremovability of the judge from office.

Facts

Decision no. 62/2024 of the Constitutional Court declared the termination of the mandate of the constitutional judge E.T. before the term, due to her resignation, but did not determine the date of the end of this constitutional mandate. Subsequently, the Assembly, as the appointing body of the constitutional judge, announced the opening of the procedure to fill this vacancy, considering that judge E.T. had been appointed on 14.11.2019 for a full 9-year mandate and determined 14.11.2028 as the date of the end of the replacement mandate.

Regarding the mandate of the constitutional judge H.Z., the other appointing body, the Supreme Court, through its President, on 11.12.2024 announced the opening of the procedure for the election of the new successor judge by this body.

Subsequently, the President of the Constitutional Court addressed the Court with a request for the declaration of the end of her mandate as a judge. The Court, by decision no. 84, dated 23.12.2024, declared the termination of the mandate of judge H.Z. on 10.03.2025, due to the expiration of its duration. The decision also determined that the announcement of the vacancy by the appointing body is made after the declaration of the end of the judge's mandate by the Constitutional Court itself.

After becoming acquainted with this decision, the President, in the capacity of one of the three appointing bodies, on 30.01.2025 addressed the Court with a request for the declaration of the end of the mandate of the constitutional judge belonging to his appointment.

Court's Assessment

On the declaration of the termination of mandate of the constitutional judge – The Court observes that the President's request has as its object the declaration of the termination of the mandate of the constitutional judge, but the legal basis and the reasons contained in it relate to the resolution of a dispute of competences and, for this purpose, the final interpretation of constitutional norms. The constitutional amendments of 2016 adopted the transitional provision, Article 179, paragraph 3, which provides: *"With the aim of the regular renewal of the composition of the Constitutional Court, the judge who will replace the judge whose mandate ends in 2017 shall remain in office until 2025, and the new judge who will replace the judge whose mandate ends in 2020 shall remain in office until 2028. The other judges of the Constitutional Court are appointed for the entire duration of the mandate, according to the law."* The Court considers that, as long as the constitutional legislator, in compliance with the constitutional jurisprudence, determined the valid and appropriate mechanism for respecting the constitutional pro-

vision of its periodic partial renewal, a different interpretation of Article 179, paragraph 3, of the Constitution, even by again requesting the intervention of the constitutional legislator, would run counter to the principle of constitutional loyalty and that of the coherence of the Court's jurisprudence, to which the Court itself is also subject.

The Court emphasizes that the duration of the constitutional mandates that belong to this transitional regime has been limited in time, since only in this way and only through this interpretation will the main purpose of the transitional provision, Article 179, paragraph 3, of the Constitution, be guaranteed. The express provision in this disposition for determining two mandates shorter than 9 years serves and functions to guarantee the principle of regular renewal, which means establishing the rule of renewal by one third and not the opposite.

Article 179, paragraph 3, of the Constitution, unlike Article 125, paragraph 7, which provides that the constitutional judge continues in office until the election of his successor, does not speak of successor judges, but of the judge who will replace the judge whose mandate ends in 2017. Consequently, the constitutional norm (transitional provision) contains a provision different from the general rule of duration in office and termination of the mandate. For the purpose of implementing the constitutional principle of the periodic partial renewal of the Court, the constitution-maker appears to have taken into consideration the link between the end of the mandate of the predecessor judge and the (ideal) beginning of the tenure of the new judge.

Although the scheme for the renewal of the composition of the Court during the transitional regime provides the possibility that the constitutional judge may exercise the function for a period shorter than the constitutional 9-year mandate, this finds constitutional support and is permissible by the constitution-maker itself, insofar as it reflects its own constitutional concept, with the aim of guaranteeing the principle of the periodic partial renewal of this Court. This type of understanding does not repeal the 9-year term of office, but links its application, as a comprehensive process, with the periods of the renewal of the Court. In the Court's assessment, respect for this principle would also guarantee respect for

the principle of the separation and balancing of powers through the observance of the constitutional mechanism of the quotas of each appointing body in the composition of the Court every three years.

In this sense, the Court considers that the mandate of the constitutional judge appointed by the President of the Republic ended on 25.04.2025, a date which coincides with the date of the end of the mandate of the judge whom he replaces. Likewise, the Court considers that, in accordance with the interpretation of its decision, the constitutional mandate belonging to the appointment of the Assembly also ended on 25.04.2025. Therefore, the Assembly must take measures to guarantee the respect of the partial renewal of the Court in 2025 by re-announcing the procedures for the election of the new constitutional judge, part of its quota, in accordance with the constitutional and legal provisions in force, as well as with the reasoning of this decision.

The Court decided on the competence for declaring the mandate; the separate examination regarding the declaration of the termination of the mandate; and the interpretation of Article 179/3 of the Constitution.

 To consult and download the full judgement, please follow the link: [Judgement in PDF](#) or scan the QR code:



LOCAL GOVERNANCE

The right to due process in the procedure for the dismissal from office of the Mayor

 Decision no. 66, dated 03.11.2025

 Erion Veliaj, Mayor of Tirana

The dismissal of the mayor is carried out only in cases where he has committed a serious violation of the Constitution or the laws. The ordinary legislator does not have the competence to provide for other or broader grounds for dismissal beyond a serious constitutional or legal violation. The measure of dismissal brings direct consequences to the exercise of the elected mandate; therefore, public bodies have the positive obligation to actively ensure respect for the procedural rights of the dismissed official and to avoid any practice that deprives him of the real possibility of defense.

Facts

The applicant, elected Mayor of the Municipality of Tirana in 2025, was placed under the security measure “arrest in prison” by the courts for the purposes of criminal proceedings initiated against him in 2024. The Municipal Council, by decision no. 69, dated 23.09.2025, proposed to the Council of Ministers the dismissal of the applicant from office, based on Article 62, letter “c”, of the Law on Local Governance, according to which the mayor is dismissed for failure to appear at work for an uninterrupted period of three months, without attributing to him any conduct committed with fault. The Council of Ministers, by decision no. 539, dated 25.09.2025, decided on the dismissal of the applicant from office. The entire administrative procedure for the applicant’s dismissal from the position of mayor lasted only 5 days. In re-

lation to this procedure, the applicant was not notified to be heard and was not notified of the respective acts. Subsequently, the applicant addressed the Court with an individual constitutional complaint, requesting the annulment of the decision of the Council of Ministers.

As regards the notification of the Council of Ministers on the creation of vacancies for mayors in six municipalities of the country, including the Municipality of Tirana, and the setting of the date for partial elections, the President decided on 01.10.2025 the election date also for the Municipality of Tirana. The applicant again addressed the Court, requesting also the annulment of the decision setting the elections and the suspension of its effects for the part that determined the date of the local elections in the Municipality of Tirana. The Meeting of Judges decided to suspend the decree for the part that determined the date of the local elections in the Municipality of Tirana.

Court’s Assessment

On constitutional jurisdiction – The Court has the competence to review the decision of the Council of Ministers on the dismissal of the local government body, regardless of the cause referred to in that decision. The formula of dismissing the mayor by the Council of Ministers for serious constitutional and legal violations, provided for by Article 115 of the Constitution, constitutes administrative supervision of the central government over the activity of local government. The constitutional complaint of the mayor against the dismissal decision is an essential mechanism for the protection of local autonomy and the balancing of powers. The law does not prevail over the Constitution and therefore cannot create new grounds for dismissal beyond the constitutional provision. The

Court also has the competence to review the decree of the President setting the date of the elections, due to its functional connection with the decision on the dismissal of the elected local body. These two acts are not normative but are successive in the procedure for electing the new local body in the vacancy created by the dismissal and serve the same constitutional purpose; therefore, their review cannot be separated. The opposite would harm the establishment of the facts of the dispute and risk the coherence of legal acts.

On the right to due process in the dismissal of the mayor from office – The Court assessed that the decision to dismiss the applicant from office is the result of an irregular legal process conducted by the municipal council and the Council of Ministers, which consequently also infringed the principle of local autonomy. The public authority has the positive obligation to actively undertake all necessary procedural measures to guarantee a fair process. The failure to notify the applicant of the reasons, the legal basis and the progress of the procedure, as well as the failure to take the necessary measures to enable him to effectively exercise the right to be heard and to defend himself, created a situation in which his participation became illusory and formalistic. Therefore, the decision to dismiss the elected local body was taken in violation of the essence of the constitutional guarantees to the point of their nullification.

The explicit content of Article 115 of the Constitution regarding the grounds for dismissal does not grant the ordinary legislator the competence to provide for other or broader grounds for dismissal beyond a serious constitutional or legal violation. Although the legislator did not specify that the three-month absence provided for in Article 62, letter “c”, of the Law on Local Governance must be unjustified, intentional, or dependent on the will of the local government body, this provision cannot be interpreted in isolation from Article 115 of the Constitution. Any interpretation of Article 62 of the Law on Local Governance must ensure that its application does not allow factual circumstances that

do not arise from the conduct of the mayor of the local government unit to be automatically considered a serious violation of the Constitution or the laws. Failure to appear at work for an uninterrupted three-month period may constitute a serious breach in the performance of duties by the mayor, but only when he can and should be held responsible, unlike in the present case, where no legal responsibility is attributed to the applicant. The mechanical application of a legal provision without connection to the constitutional material criterion constitutes a deviation from the constitutional order and infringes the essential guarantees of exercising the mandate of local representation.

On the decree setting the elections – The Court noted that the President issued the decree even though the dismissal decision of the Council of Ministers, due to the filing of the constitutional complaint by the elected local body, was suspended *ipso iure* under Article 115 of the Constitution. He was obliged to wait for the final decision of the Court, and only in the event that the dismissal decision remained in force could he exercise his competence. The competence in question must be exercised according to the principle of constitutional loyalty. It aims to provide the necessary democratic legitimacy to the early elections to be held, in the sense of the President’s constitutional neutral role, not only to represent the unity of the people and serve the general interest, but also to guarantee due process and the principle of local autonomy. In conclusion, the Court assessed that the President’s decree, for the part that set the date of the elections in the Municipality of Tirana, violated constitutional provisions and must be annulled.

The Court decided, by a majority vote, to accept the request.

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INDIVIDUAL CONSTITUTIONAL COMPLAINT

Substantial Rights

Precautionary Seizure “for equivalence” of Assets

 Decision no. 20, dated 11.04.2025

 Arben Ahmetaj

To respect the constitutional criteria of limitation by law and the standards of fair adjudication, the prosecution, in the request for the imposition of a seizure measure, and the ordinary courts, in reviewing and assessing it, must specify and clarify in which of the categories under Article 274 of the Code of Criminal Procedure (CCP) and Article 36 of the Penal Code (PC) each of the items requested to be seized falls. That is, whether the items are objects or products of the criminal offense (direct seizure) or whether it concerns a seizure “for equivalence” of other items that do not fall within the category of those directly related to the criminal offense.

In cases where a “for equivalence” seizure is applicable, the judge must appropriately justify the impossibility of achieving the same result through a less restrictive intervention, both regarding the scope of the items and assets to be affected and regarding the rights inherent in the substantive law of private property.

The way in which the courts have assessed the request for the imposition of the seizure measure and applied the provisions of letter “ç”, point 1, of Article 36 of the Criminal Code, has resulted in an arbitrary outcome in the applicant’s constitutional right to private property.

Facts

The applicant obtained the status of a person under investigation as a suspect for committing the criminal offenses provided for in Articles 257/a, second paragraph and 25, 260, and 287, second paragraph, of the Penal Code. Within the framework of the criminal proceedings, the prosecution submitted a request for the imposition of the asset security measure “Precautionary Seizure” for several of the applicant’s assets, including an apartment and the amounts found in his bank account and deposit. The Special First Instance Court for Corruption and Organized Crime decided to grant the request.

The applicant filed an appeal challenging the decision only regarding the aforementioned assets. The Special Appellate Court for Corruption and Organized Crime upheld the first-instance decision, while the Criminal College of the Supreme Court decided not to admit the appeal.

Court’s Assessment

On the infringement of the right to property in procedural terms - Precautionary seizure may be ordered not only on items that have a specific connection to the criminal offense being prosecuted but also “for equivalence,” i.e., on any other property whose value corresponds to that of the products of the criminal offense. To respect the constitutional criteria of limitation by law and the standards of fair adjudication, the prosecution and ordinary courts must specify and clarify in which of the categories under Article 274 of the Code of Criminal Procedure (CCP) and Article 36 of the Penal Code (PC) each of the items requested to be seized falls, that is, whether they are objects or products of the criminal offense (direct seizure) or whether it concerns a “for equivalence” seizure of items indirectly related to the criminal offense “for equivalence” seizure, unlike direct seizure, because it is not directly identifi-

able in connection with the offense itself, requires the application of certain filters. The application of direct seizure to the products of the criminal offense or its proceeds does not simultaneously allow, for the same purpose, the “for equivalence” seizure of other assets of the individual subject to criminal proceedings.

The Court notes that the judicial decisions contain contradictions between the criminal facts, the findings of the Special Prosecution, and the conclusions on the application of Article 36, paragraph 1, letter “ç” of the Penal Code, which was the legal basis used for seizing all three assets under appeal.

The first contradiction lies in the fact that the courts doubted the legality of the creation of the “apartment” asset as well as the seized amounts. Considering these doubts as products of the criminal offense, because they directly derive from it, leads to the application of letter “b,” paragraph 1, of Article 36 of the Penal Code, since a “for equivalence” seizure is applicable only to items that are not products of the criminal offense or not subject to investigation.

The second contradiction concerns the fact that, for the same alleged amount obtained through illegal acts, the courts applied a “for equivalence” seizure both on the immovable property “apartment” and on the monetary amounts, without analyzing how and to what extent the value of the seized items corresponds to that of the criminal offense products under Article 274 of the CCP and Article 36, paragraph 1, letter “ç,” of the Penal Code.

The prosecution and courts did not verify the manner and extent to which the value of the “apartment” corresponds to that of the products of the criminal offense. Even in the request for the seizure measure, the amounts allegedly obtained illegally were specified, but no assessment was made of the relationship between the value of the item and the products of the criminal offense. The courts did not justify why such a limitation of the applicant’s property rights was the only means to achieve the intended purpose and why no other less harmful measure, in terms of the principle of proportionality, could achieve the same result for the constitutional right to private property. The manner in which the courts as-

sessed the request for the seizure measure and applied the provisions of Article 36, paragraph 1, letter “ç,” of the Penal Code, produced an arbitrary result in the applicant’s constitutional right to private property.

The Court decided, by majority vote, to accept the application in part.



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INDIVIDUAL CONSTITUTIONAL COMPLAINT

Substantial Rights

Infringement of freedom of expression regarding the protection of a journalist's source

 Decision no. 21, dated 22.04.2025

 Elton Qyno

The journalist's right to protect a source and not disclose it is one of the fundamental conditions of press freedom. This right is not merely a privilege to be granted or withdrawn depending on the legality of the sources, as it essentially also protects the public's right to information, which is itself a matter of public interest. This right can be restricted according to constitutional criteria, but without destroying the core of press freedom. Restrictions can only be justified if no alternative means exist to achieve the same purpose—that is, identifying the source is the only or last resort, meaning all other possible measures have been exhausted and the legitimate interest in revealing the source outweighs the public interest in maintaining confidentiality. Ordinary courts must distinguish between cases where the prosecution is conducting investigations related to an alleged criminal act by the journalist and investigations primarily aimed at obtaining information about the journalist's source, where the journalist has committed no criminal offense. The legislator must consider the need to amend legal rules concerning the seizure of computer data, ensuring they properly respond to current developments in information technology, the need for effective investigations, but above all the effective protection of individuals' fundamental freedoms.

Facts

The applicant, in his capacity as a journalist, published several articles containing secret investigative information from a criminal proceeding, specifically communications between a justice collaborator and other persons involved in criminal activity. The Special Prosecution registered criminal proceedings for the offenses of revealing acts and secret information, and for prohibiting the disclosure and publication of such information in violation of the law. The applicant was summoned by the prosecution to identify the source of the information and was warned not to continue publishing materials related to the investigation. When he refused to disclose the source, the Special Prosecution submitted three requests to the court for permission to conduct personal searches at his home and workplace, which were approved by the Special First Instance Court for Corruption and Organized Crime. Additionally, the Special Prosecution seized two of the applicant's mobile phones by court decision. During the execution of the judicial decisions, other items and computer data were also seized from him. The applicant challenged the decision to seize his computer data and, in a later proceeding, requested the return of all seized items.

The applicant filed an individual constitutional appeal against the judicial decisions that authorized the searches and seizure of items and computer data, claiming that these measures violated his right to due process, freedom of expression, and right to privacy.

Court's Assessment

Legitimacy – exhaustion of legal remedies considering the nature of the contested decisions
When material evidence is seized during a search, constitutional claims regarding the search procedure must first be raised by the individual in an appeal to a higher court against the seizure deci-

sion. After exhausting those legal remedies, the individual may submit an individual constitutional appeal. If the search does not result in items being seized as evidence, and the individual's fundamental rights and freedoms are infringed, constitutional claims regarding the search procedure may be brought directly to the Court via an individual constitutional appeal. In the present case, regarding the decisions to seize computer data, the applicant had exhausted legal remedies, whereas with respect to other seized items, he initiated a separate appeal procedure, for which he acknowledged he would submit another individual constitutional appeal.

On the merits

As regards the infringement of freedom of expression – The Court assessed that the judicial decisions to seize computer data interfered with the applicant's freedom of expression and limited press freedom, specifically regarding the identification of sources he possessed by virtue of his profession as a journalist. Upon reviewing the criteria set out in Article 17 of the Constitution, the Court found that the first criterion for limitation, "only by law," was satisfied. Regarding the public interest criterion, the Court determined that the request to identify the source and the seizure of his computer data pursued legitimate aims: the proper administration of justice, protection of public order and safety, and safeguarding the fundamental rights of others. These restrictions also aimed to prevent the disclosure of information covered by investigative secrecy related to an organized crime investigation and to prevent criminal acts against the justice collaborator, their family members, or other persons.

The Court assessed that, concerning the legitimate aim of preventing the leak of information and protecting the life and health of the justice collaborator, the prosecution and ordinary courts acted without waiting for the effects of the investigative secrecy order, and consequently, without analyzing why the urgent use of the last-resort measure—seizure—was necessary. Likewise, the ordinary courts did not justify why obtaining the information necessary for the investigation could only be achieved through identifying the journalist's source as the sole and final means, i.e., why

no alternative measures existed to achieve the evidentiary purpose of the seizure. Furthermore, the applicant himself was not a subject of the criminal proceeding.

The Court concluded that it was not proven that the prosecution had undertaken sufficient alternative investigative actions to identify the suspected perpetrators. The duration of the investigation—almost one and a half years—contrasted with the alleged urgency of 24 hours for interfering with the journalist's sources, indicating that the seizure of computer data was not a last-resort investigative tool, but one of the first measures aimed at obtaining the source of secret investigative acts. Additionally, the Court found that the applicant had not been provided with the necessary constitutional and conventional procedural guarantees to protect freedom of expression and the confidentiality of other sources or materials.

The Court ordered the destruction of the computer data seized as material evidence during the searches of the applicant's home and workplace.

The Court decided not to address the claim regarding infringement of private life, as it already identified a violation of the applicant's freedom of expression.

The court decided to accept the request.

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INDIVIDUAL CONSTITUTIONAL COMPLAINT

Substantial Rights

Duration of the preventive measure "House Arrest"

 Decision no. 40, dated 17.06.2025

 Mimoza Margjeka

High Court, despite being faced with a legal provision of clear content (Article 237, paragraph 4 of the Code of Criminal Procedure), by using several methods of legal interpretation, effectively created a new procedural norm according to which the duration of the preventive measure "House Arrest" is double that of the preventive measure "Imprisonment," thereby exceeding the purpose of the law.

The interpretation by ordinary courts of Articles 263 and 267 of the Code of Criminal Procedure in connection with paragraph 4 of Article 237 did not effectively guarantee the personal liberty of the applicant.

Facts

The applicant was prosecuted for the criminal offense of passive corruption. The Special First Instance Court for Corruption and Organized Crime (GJKKO, first instance) imposed the preventive measure "House Arrest," which was upheld by the Special Court of Appeal for Corruption and Organized Crime (GJKKO of Appeal) and the High Court. During the proceedings, the applicant requested the termination of the measure due to exceeding the term, which was rejected by the first instance and appellate GJKKO courts, reasoning that the duration of "House Arrest" is longer than that of "Imprisonment". The applicant filed a recourse to the High Court. While the recourse was pending, the first instance GJKKO declared the applicant guilty and terminated the "House

Arrest" measure. This decision was upheld by the GJKKO of Appeal. Regarding the recourse for the termination of the measure, the High Court rejected it on the grounds that the matter had become moot since the preventive measure was no longer in force and the applicant had been finally convicted. Upon the applicant's appeal, the Constitutional Court, by decision no. 17, dated 13.03.2024, annulled the High Court decision and returned the case for reconsideration to the same court. After reconsideration, the High Court upheld the decision of the GJKKO of Appeal.

Court's Assessment

As regards the infringement of personal liberty - In cases of preventive measures limiting individual freedom, several legal safeguards operate to protect the individual from arbitrariness. The Court analyzed whether the High Court's interpretation of the law regarding the duration of "House Arrest" violated the applicant's procedural safeguards of personal liberty to the extent that the overall judicial review conducted by ordinary courts was unfair.

The Court found that the High Court, by using multiple methods of legal interpretation, assessed that the duration of "House Arrest" is double that of "Imprisonment." Through this interpretation, the Court effectively extended the time available to public authorities for investigations and trials, exceeding the law's purpose of protecting the individual from arbitrariness in limiting personal freedom. Provisions of the Code of Criminal Procedure cannot be narrowly interpreted by the Penal Chamber of the High Court, as individual rights must always be interpreted effectively. The interpretation of procedural criminal provisions by ordinary courts was deemed unreasonable, thereby infringing the applicant's personal liberty.

The Court limited its review to the finding of in-

fringement of personal liberty, as the preventive measure “House Arrest” had been terminated, and sending the case back to ordinary courts would not have produced any concrete result for the applicant.

The Court decided to accept the request and formally recognize the infringement of personal liberty.



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INDIVIDUAL CONSTITUTIONAL COMPLAINT

Substantial Rights

Execution of a search in office of a private entity during the enforcement of a seizure order

 Decision no. 42, dated 01.07.2025

 Company "Studio Pustina" LLC

The premises/office of the legal entity, where professional activity is conducted, constitute an environment unified with the residence within the meaning of Article 37 of the Constitution and Article 8 of the ECHR, therefore its inviolability is guaranteed.

It would be disproportionate for the burden of proof to fall solely on the individual, while it is the obligation of the public authority to clearly document and prove the measures and actions taken, especially when they affect or may affect constitutional rights and freedoms.

The Criminal Procedure Code (CPC), although it generally provides for prior judicial review, exceptionally allows, in urgent cases, for such a review to be absent. However, the absence of a prior judicial decision for the search of a place or residence can be balanced by an effective *ex post factum* judicial review of the legality and necessity of this investigative measure, including the condition of its urgency.

The competence granted by the CPC to the judge to decide on the search of a place or residence aims at the preventive control of this measure by an independent and neutral body. Prosecutorial authorities have the obligation to ensure that the legal safeguard of prior judicial supervision, as a protective measure of the individual's fundamental rights, is effective in practice.

Facts

The applicant, "Studio Pustina" LLC, operating in the field of consultancy and financial services, had documents and computers seized that could contain evidence, within the framework of the investigation of the criminal offense "Money Laundering of the Proceeds of Crime or Criminal Activity." The investigation had earlier been initiated by the Special Prosecution, against its client, the construction company "H" LLC, and its partners. The seizure measure was executed by three OPGJs (Judicial Police Officers) under the order of the case prosecutors, following a statement by F.B., administrator of "H" LLC, that the company's financial documentation related to construction activity on the property under investigation had been kept by the applicant. The applicant's administrator, A.P., filed an appeal against the seizure decision, which was dismissed by the First Instance Supreme Court, confirmed by the Court of Appeal, and again upheld by the Supreme Court.

Court's Assessment

Regarding the right to inviolability of the residence - The interference with the applicant's right consisted of the practical implementation of a search measure in its office, accompanied by seizure, which, in terms of manner of execution and practical effects, essentially constitutes a search of a residence for the purposes of applying Article 37 of the Constitution and Article 8 of the ECHR.

The fact that the applicant's representative, A.P., allowed the OPGJs to enter the office, or that she cooperated with them, cannot be interpreted as consent to permit them to search the office for objects, documents, or anything else of interest to the ongoing criminal investigation. In this regard, the principle applies that waiving a fundamental right must be clearly determined, with full knowledge of the facts, based on informed con-

sent and without coercion. The Court concluded that there was interference with the applicant's right to the inviolability of the residence.

The Court notes that a search of a place or residence initiated by OPGJs, without a court order, is a measure permitted by the Criminal Procedure Code (CPC), but only under conditions strictly defined therein, which essentially requires interpretation of the legal provisions. The Court considered it unnecessary to specifically address compliance with the CPC regarding the search measure executed by the OPGJs in the framework of the seizure order, but focused on the *proportionality of the measure*.

The (limited) search in this specific case aimed at finding data and evidence for the commission of the criminal offense of money laundering of the proceeds of crime or criminal activity, with the purpose of preventing and maintaining public order and safety from criminal activity, which constitutes a legitimate aim in terms of public interest under Article 17 of the Constitution.

As regards the *proportionality of the interference*, the Court emphasized that, in addition to the lack of prior judicial review, the not entirely accurate nature of the seizure decision, and the fact that the applicant was not guaranteed the right to have a trusted person or legal counsel present, in this case, even though courts acted *ex post facto* upon the applicant's appeal, the judicial review was not effective. The interested party and subsequent ordinary courts did not fulfill their obligation to provide "relevant and sufficient" reasons to justify the implementation of a search in the applicant's office. The Court found that the interference in the applicant's office was not proportionate to the situation that dictated it.

Regarding the freedom of economic activity -Based on the legitimate purpose of the interference, in terms of public interest, in relation to the duration of the seizure measure, the Court found the applicant's claim regarding the seized computer equipment to be unfounded. Maintaining the seizure during this period preserved a fair balance between the applicant's material interest and the public interest in preventing and prosecuting the criminal offense.

The Court decided to accept the application in part.



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INDIVIDUAL CONSTITUTIONAL COMPLAINT

Substantial Rights

Infringement of the right to the protection of personal data and the confidentiality of correspondence, as a result of the seizure and inspection of the mobile phone

 Decision no. 44, dated 29.07.2025

 Onejda Ymeraj

In the context of smartphones, accessing stored data can potentially extend to a very wide spectrum of information and allow highly detailed conclusions to be drawn about an individual's private, professional, and social life. For this reason, state interference with such data cannot be treated as interference with an ordinary evidentiary object, but as interference in an expanded sphere of private life, with high constitutional intensity. Consequently, interference with Articles 35 and 36 of the Constitution, and Article 8 of the ECHR, must in principle be considered "serious" and, in certain circumstances, "particularly serious," when it affects data of a sensitive nature.

To prevent arbitrariness, the search, analysis, and selection of data should, as a rule, be subject to prior judicial review, capable of rejecting or limiting the measure when the interference is disproportionate.

The decision on the seizure measure must at least specify procedural safeguards to minimize the interference, particularly regarding: (a) Limiting the scope of the search by identifying the electronic device and, where applicable, the system or systems connected to it, as well as specifying the object of the search, the type of data, keywords or filtering criteria, and the temporal scope, with the aim of avoiding irrelevant data and, where applicable, data enjoying special legal

protection; (b) Limiting the retention period and the circle of exposure of the data, by setting deadlines for storage and analysis, as well as authorized persons for access, so that the interference does not turn into a general and uncontrolled collection of information; (c) Detailed documentation of all actions carried out for searching and analyzing the data, including the method of access, criteria used for the search, selected data, and measures taken to ensure integrity, so as to enable real and effective judicial control in cases of claims of arbitrariness, exceeding authorization, or violation of procedural safeguards.

Facts

The applicant was questioned by the Special Prosecution as a person with knowledge of the criminal offense of corruption in connection with a criminal proceeding registered against two citizens. Following her statements, the Special Prosecution ordered the inspection of the applicant's mobile phone, to which the applicant raised no objections. During the inspection carried out by the OPGJs, communications relevant to the investigation were discovered, which led them to seize the applicant's device (the "mobile phone"), an action later validated as lawful by the Special Prosecution. For this purpose, the prosecution also ordered an electronic expert examination to extract the data contained on the mobile phone.

As the prosecutors did not accept her request for the return of the mobile phone, the applicant challenged the seizure decision in court. The First Instance Supreme Court (GJKKO) accepted her request, reasoning that the seizure had been carried out without a court order, and ordered the return of the phone to the applicant. On appeal by the Special Prosecution, the Court of Appeal

overtaken this decision, rejecting the applicant's appeal, while the Supreme Court decided not to admit the applicant's recourse.

Court's Assessment

As regards to the infringement of the right to personal data protection - The Court considered that personal data contained in a mobile phone used by an individual falls within the scope of protection guaranteed by Article 35 of the Constitution.

Regarding the right to confidentiality of correspondence - The Court emphasized that the protection offered by Article 36 of the Constitution focuses on an individual's remote communication and includes both electronic communications in transit and those stored. This guarantee extends to any device made available by technological developments for communication purposes, including electronic devices (such as a smartphone), which were unknown at the time the Constitution was adopted.

a) Whether there was interference with the applicant's right to control personal information and correspondence confidentiality - The Court noted that the seizure of the mobile phone and its personal and correspondence data, as well as accessing it through copying and storing the data it contains, constitutes interference with Articles 35 and 36 of the Constitution. This is because the seizure of the mobile phone is not merely the seizure of an object in itself, but also the seizure of an "archive" of stored data, including personal data and correspondence.

b) Whether the interference was justified - in the meaning of Article 17 of the Constitution and the case law of the ECtHR;

i.1) Whether the interference was conducted with the applicant's consent - Voluntarily handing over the mobile phone and signing the seizure report without objections does not constitute a waiver of constitutional rights or consent to the collection and processing of personal data and correspondence stored on the phone. Waiving a fundamental right can only occur based on informed consent, i.e., when the individual has full knowledge of the relevant facts, and must be accompanied by minimal safeguards proportion-

ate to the importance of the right, which was not realized in this case. Furthermore, the individual must be fully informed in advance of the right to refuse, even partially, the collection and access for further processing of personal data and correspondence stored on the phone, while the state authority must guarantee the presence of a lawyer during this process, if requested. In the applicant's case, the interference with the rights guaranteed by Articles 35 and 36 of the Constitution was not carried out with her consent.

i.2) Whether the interference was authorized by law - The search of computer data representing personal data or private correspondence must, in principle, be authorized by a prior court decision. This decision must be sufficiently reasoned so that the interference is limited strictly to what is necessary for the investigation, avoiding arbitrariness. In urgent or emergency cases, as an exception, the public interest may justify the seizure of the electronic device and temporarily also the data stored on it, in full, on the initiative of the OPGJ, without a prior court decision. However, in such cases, the measure is subject to automatic control by the prosecutor and ex post judicial review upon the individual's appeal, where legality is assessed: first, regarding the urgency, which must be real, concrete, and justified in the specific circumstances of the case; and second, regarding the necessity for the purposes of the criminal proceedings, i.e., whether there were reasonable grounds to believe that the device contained data relevant to the investigation.

-ii) Whether the interference pursued a legitimate aim - The Court noted that the seizure of the phone and the computer data stored on it, with the aim of finding data for the commission of criminal offenses of corruption and money laundering, pursues a legitimate aim in terms of public interest, within the meaning of Article 17 of the Constitution.

-iii) Whether the interference was proportionate, in relation to the situation that dictated it - The Court observed that the decision to carry out a technical-electronic examination of the phone was drafted in broad terms, without reasonably limiting the scope of the measure. The prosecution's order to extract, copy, and seize the entire contents of the phone, regardless of whether the

data stored were relevant to the investigation, and allowing examination even of data irrelevant to the investigation, exceeded what was necessary to achieve the legitimate aim. Therefore, the interference was not proportionate to the situation that dictated it and was consequently disproportionate.

The Court decided to accept the application in part.

To consult and download the full judgment, please follow the link: [Judgement in PDF](#) or scan the QR code



INDIVIDUAL CONSTITUTIONAL COMPLAINT

Substantial Rights

Proportionality of compensation as a consequence of expropriation of property for public interest

 Decision no. 82, dated 18.12.2025

 Klodiana Cankja, Ermelinda Cankja, Ardit Cankja, Drita Cani, Suzana Cani, Marvis Cani, Engjëll Tirana, Brian Tirana, Helga Hasekiu

The purpose of compensation under Article 41, point 4, of the Constitution is to restore a situation “equivalent to the previous state.” The essence of the constitutional guarantee is to ensure a balance between the public interest and the extinguishment of an individual’s property right, from which derives the state’s clear and unconditional obligation to provide fair compensation for expropriation. This compensation may correspond to a full valuation, but it may also be lower, as its calculation does not consider only the interest of the affected individual but weighs it against the public interest.

The competent authorities, during the expropriation procedure, and subsequently ordinary courts, during judicial proceedings, must carefully examine all relevant factors in determining compensation from expropriation to achieve the proper balance and not impose an excessive burden on the individual.

Facts

The Council of Ministers expropriated two properties (land and building) belonging to the applicants in accordance with the expropriation law, based on a municipal request, for the purpose of constructing a road within the city. Claiming

that the compensation amount was not fair, the applicants filed a lawsuit in court. During the proceedings, an expert report was submitted regarding the calculation of compensation according to market value, which almost tripled the amount awarded to the applicants. Ultimately, the Administrative Court of First Instance in Durrës dismissed the lawsuit, holding that the compensation had been calculated based on the sub-legal acts in force at the time the expropriation request was submitted, while the expert report did not have predetermined evidentiary value and was not linked to other evidence reviewed. According to the court, the expropriation value had to be determined according to a state methodology so as not to compromise the fulfillment of the public interest. This decision was upheld by the Administrative Court of Appeal, and the Supreme Court decided not to admit the applicants’ recourse.

Court’s Assessment

Regarding the infringement of the reasoning standard of the decision related to the proportionality of interference with property rights - The lawful limitation of property rights must be conducted “by law,” “only for public interest,” and “only against fair compensation.” Therefore, the Court examined whether the Supreme Court had sufficiently reasoned the compensation amount, i.e., whether the criterion of proportionality of the interference was met, given that it was proven that the applicants experienced a lawful and public-interest-based interference with their property rights. The Court found that, although the applicants’ recourse regarding the lack of reasoning by the Court of Appeal for fair compensation from expropriation concerned a potential violation of constitutional rights—which ordinary courts are obliged to examine with due diligence—the Supreme Court rejected the recourse without providing an explicit response to this claim, which was decisive for resolving the case. Consequently,

the applicants' constitutional rights guaranteed by Article 42 of the Constitution, in connection with Article 41, point 4, were infringed by the Supreme Court's decision.

Based on the nature of constitutional review of individual applications, as well as the principle of subsidiarity, the Court referred the case back to the Supreme Court for examination, which has full authority to resolve it itself or to guide the resolution by the lower court, while unifying and developing judicial practice in accordance with constitutional standards and those of the European Court of Human Rights addressed in this decision.

The court decided to accept the request.

To consult and download the full judgement, please follow the link: [Judgement in PDF](#) or scan the QR Code



INDIVIDUAL CONSTITUTIONAL COMPLAINT

Procedural rights

Replacement of the security measures previously imposed on the deputy, with the measure “House arrest”

 Decision no. 1, dated 17.01.2025

 Sali Berisha

Although some statements by members of the Council for the Regulation, Mandates and Immunity indicate political nuances in the handling of the Special Prosecution’s request or even the predetermination of their voting method, this is acceptable in the context of discussions in a political institution composed of political representatives, such as the Assembly, and does not mean that the granting of authorization was politically influenced.

The nature of decisions taken by political bodies of the Assembly, such as the Council in this case, which are in themselves political in nature, cannot be the same as the nature of a judicial decision.

Facts

The applicant, politician, former president and former prime minister, currently a member of Parliament and chairman of the main opposition party, has been charged by the Special Prosecution Office as a suspect in the criminal offence of “Passive corruption of high-ranking state officials or local elected officials”, in collaboration, as provided for in Articles 260 and 25 of the Criminal Code, for the time when he exercised the function of prime minister. For this reason, upon the request of the prosecution, the ordinary courts have imposed two security measures on him, namely “The obligation to report to the judicial police” and “The prohibition on leaving the country”. Given that the obligation

imposed in one of these measures has not been fulfilled by the applicant, namely “The obligation to report to the judicial police”, the courts have decided to replace the measures with the measure “House arrest”.

Court’s Assessment

On the procedural aspects of the infringement of personal freedom

On the infringement of the parliamentary procedure for the lifting of immunity - According to the Court, although some statements by members of the Council for the Regulation, Mandates and Immunity indicate political nuances in the handling of the Special Prosecution’s request or even the predetermination of their voting method, this is acceptable in the context of discussions in a political institution composed of political representatives, such as the Assembly, and does not mean that the granting of the authorization was politically influenced. In the Court’s assessment, the nature of decisions taken by the political bodies of the Assembly, such as the Council in the present case, which are in themselves political in nature, cannot be the same as the nature of a judicial decision. In the Court’s assessment, the parliamentary body that examines the request for the lifting of immunity should not make a legal assessment of the case and should not under any circumstances give its position on the guilt or otherwise of the relevant deputy or the merits of the criminal proceedings.

For the violation of the right of access related to the standard of reasoning of the judicial decision -The Court has assessed that the courts of ordinary jurisdiction (the Special Court of First Instance for Corruption and Organized Crime and the Special Court of Appeal), in their assessment of the replacement of the personal security measure against the applicant, have sufficiently reasoned

for the reasons that justified its replacement. According to the Court, the High Court has also provided sufficient arguments, on the basis of which it has reached the manner of concluding the case. For these reasons, the Court has assessed that the decisions challenged by the applicant meet the standards established by constitutional jurisprudence for their reasoning.

As regards the violation of the principle of impartiality

– The Court has assessed that the applicant’s status as the president of a collegial body, which has decided to dismiss Judge I.Gj., is not a reason to question the impartiality of that judge in this case, as long as it does not result and has not been proven that he (the applicant), in his capacity as the president of that body, had a decisive vote in this regard or had initiated disciplinary proceedings against the judge or had any decisive role in the disciplinary proceedings against her. The Court also assessed that the actions of Judge I.Gj., in her capacity as Deputy President of the First Instance Court of Appeals, for appointing another judge to review the applicant’s request for her exclusion from reviewing the case, were carried out in the exercise of her administrative and management duties in the management of that court and are related only to her function as Deputy President, and therefore do not affect her impartiality.

On the substantive aspect

On the infringement of personal freedom and the right to exercise parliamentary activity - The Court, at the end of the discussions, did not reach the required number of votes for decision-making, according to the provisions of Article 133, paragraph 2, of the Constitution, and Article 72, paragraph 2, of Law No. 8577/2000. According to one position, the personal security measure “House arrest”, imposed on the applicant, was not proportional, so the application should have been accepted for this reason. According to the other position, the ordinary courts have correctly and in good faith applied the substitution of the two security measures for that of house arrest against the applicant, establishing the appropriate balance between the purpose of implementing the court orders, as well as the

importance of personal freedom and the right to be elected.

The Court decided to reject the application.

To consult and download the full judgment, please follow the link: [judgement in PDF](#) or scan the QR code



INDIVIDUAL CONSTITUTIONAL COMPLAINT

Procedural rights

Violation of the principle of presumption of innocence related to the standard of reasoning of the judicial decision

 Decision no. 67, dated 05.11.2025

 Aleksandër Fadili

To investigate a suspicious disappearance and a suspicious death, the analysis must begin with the discovery of the body, the crime weapon, the crime scene, the motive and the mechanism of the murder, and in the present case the courts of ordinary jurisdiction have not analyzed the probative value of blood stains related to the absence of a body in terms of guilt, as long as the crime weapon has not been found.

The courts of ordinary jurisdiction have reasoned that the applicant did not cooperate in indicating the location of the victim's body, but this is not sufficient to justify the presumption of fact.

Facts

The applicant filed a criminal complaint at the Kurbin Police Station, after losing contact with his friend, with whom he was also in a working relationship, citizen F.F. The Kurbin Prosecutor's Office, after investigative actions, has taken the applicant as a defendant, since according to it, reasonable suspicions, based on evidence, had been created that citizen F.F. was killed with the intention of stealing the amount of money he had with him and the last person who had contact with him was the applicant. At the end of the trial, the Kurbin Judicial District Court, decided to declare him guilty for committing the criminal offense of "Robbery resulting in death", and sentenced him to 25 years in prison. The de-

cision was upheld by the court of appeal and the Criminal Panel of the Supreme Court decided to reject the applicant's appeal. On 21.01.2025, the applicant addressed the Court with an individual constitutional complaint, challenging the decisions of the three courts.

Court's Assessment

On the violation of the right not to plead guilty based on evidence collected illegally - The Court assessed that the applicant is not entitled to claim the exhaustion of effective legal remedies, as he did not raise this claim in the appeal or in the recourse, although in the latter he cited it in general terms.

As regards the principle of impartiality, the Court assessed that no arguments had been presented at the constitutional level.

For the principle of presumption of innocence related to the standard of reasoning of the judicial decision - The Court, for the purpose of respecting the guarantees of the principle of presumption of innocence, analyzed three criteria: *i) The first criterion, the fair and clear determination of the facts of the case important for the assessment of legal responsibility*, for which it assessed that the courts have not sufficiently reasoned regarding the fact that there is no corpse, whether citizen F.F. has disappeared or been killed and why he was presumed as such or why the disappearance was presumed as murder. *(ii) The second criterion, broken down into three sub-criteria: fulfillment of the obligation for the burden of proof by identifying the decisive evidence (first sub-criterion), respect for the right not to incriminate oneself (second sub-criterion), whether the process has begun with the conviction that the applicant has committed the criminal offense (third sub-criterion)*. At the end of the analysis for each sub-criterion, in summary, the Court assessed that: *For the first sub-criterion*, the courts of ordinary jurisdiction

have attempted to fulfill the obligation for the burden of proof, by identifying some determining scientific evidence, which have been evaluated in unity with each other. However, the manner of their reasoning seems to have relieved the prosecutor of the burden of proof and passed it on to the applicant, who, according to them, has been in a denial and non-cooperative position. *For the second sub-criterion:* the right not to incriminate oneself has been interpreted arbitrarily, since the courts of ordinary jurisdiction have accepted the existence of "cruelty" in the commission of the criminal offence, based solely on the applicant's denial during the trial, who refused to show the body *For the third sub-criterion:* The Court assessed that it does not appear that the investigation and trial began with the suspicion and prejudice that the applicant is guilty of the murder of F.F., and that the courts of ordinary jurisdiction should have analyzed and reasoned more clearly the connection between the criminal fact of murder and the commission of the murder by the applicant, in the circumstances where the victim's body was not found.

(iii) Third criterion: whether the presumptions of fact and legal presumptions were used reasonably - The Court assessed that the presumptions of fact must remain within reasonable limits, which must be clearly defined through the reasoning of the judicial decisions, which in the specific case should have focused on the analysis of why the fact of the murder was presumed in the absence of the victim's body, in the analysis of other evidence collected in this criminal process. From the above assessment, the Court concluded that the manner of reasoning of the courts of ordinary jurisdiction for the presumption of the fact of disappearance, death or murder and its perpetrator is not complete and clear. They have incompletely fulfilled the obligation to respond to the applicant in the reasoning of the judicial decisions for his claims for the violation of the principle of the presumption of innocence, yielding to the analysis of a fair and harmonious report of the entire ensemble of evidence proving guilt, whether they are direct or indirect determinants/essential, taking into account that the measure of caution must be at a reasonable level, as long as we are facing a criminal offense, where the severity of the punishment significant-

ly jeopardizes substantial constitutional rights.

In conclusion, the Court assessed that the High Court has maintained a formal position and has not repaired the violation of the courts of fact, whose reasoning was unconvincing, violating the standard of reasoning of the judicial decision in terms of the principle of the presumption of innocence.

The Court decided to accept the application in part.

To consult and download the full judgement, please follow the link: [Judgement in PDF](#) or scan the QR code





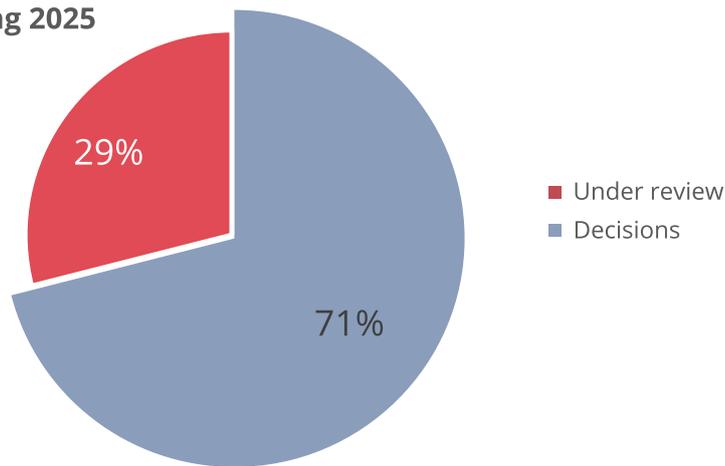
Judicial Activity: Statistics

Registered applications and final decisions

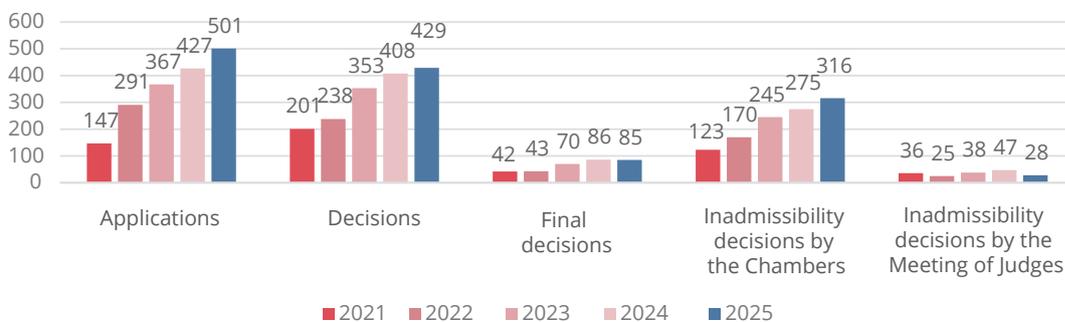
During 2025, the Constitutional Court:

- registered **501** new applications, to which **104** carried over from 2024, i.e. a total of **605** applications.
- has issued a total of **429** decisions (**85** final decisions and **344** inadmissibility decisions).
- 173** applications have been forwarded for consideration in 2026.

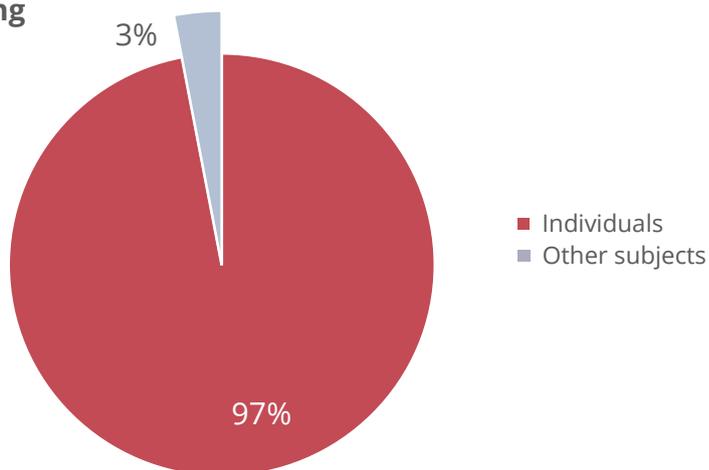
Decisions and cases under review during 2025



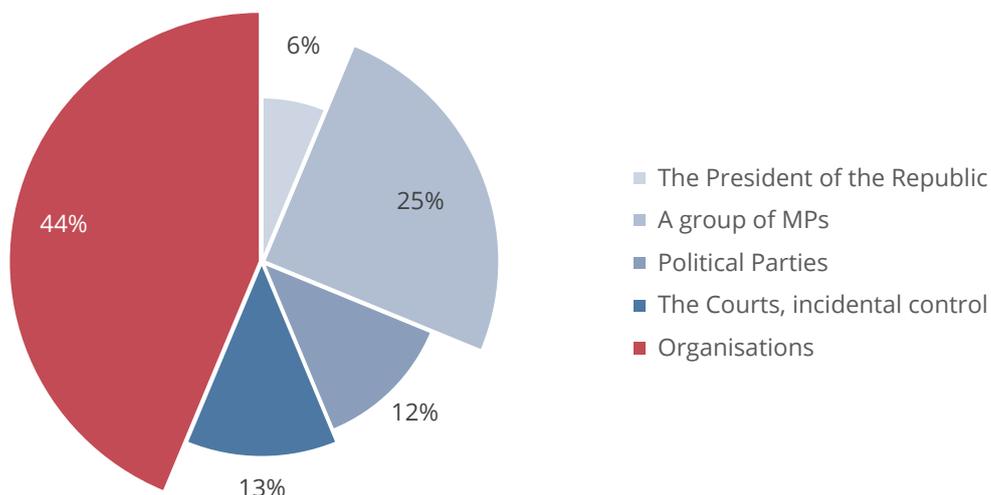
Comparative Table 2021-2025



Applications according to the subjects



Applications according to the Other subjects



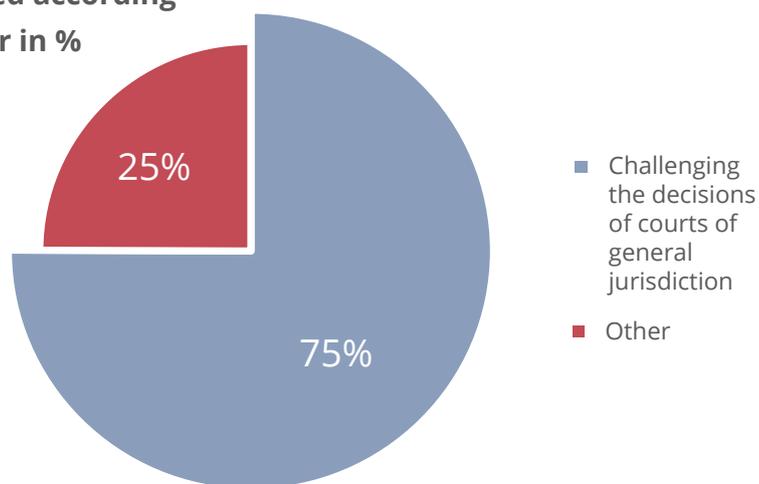
Applications filed during 2025, grouped by subjects that set the Constitutional Court in motion:

| Subject | Number of applications submitted |
|--|----------------------------------|
| Individuals | 485 |
| Non-profit organization | 7 |
| Not less than 1/5 of the members of parliament | 4 |
| Political parties | 2 |
| Courts of the ordinary system (Incidental Control) | 2 |
| President of the Republic of Albania | 1 |
| Total | 501 |

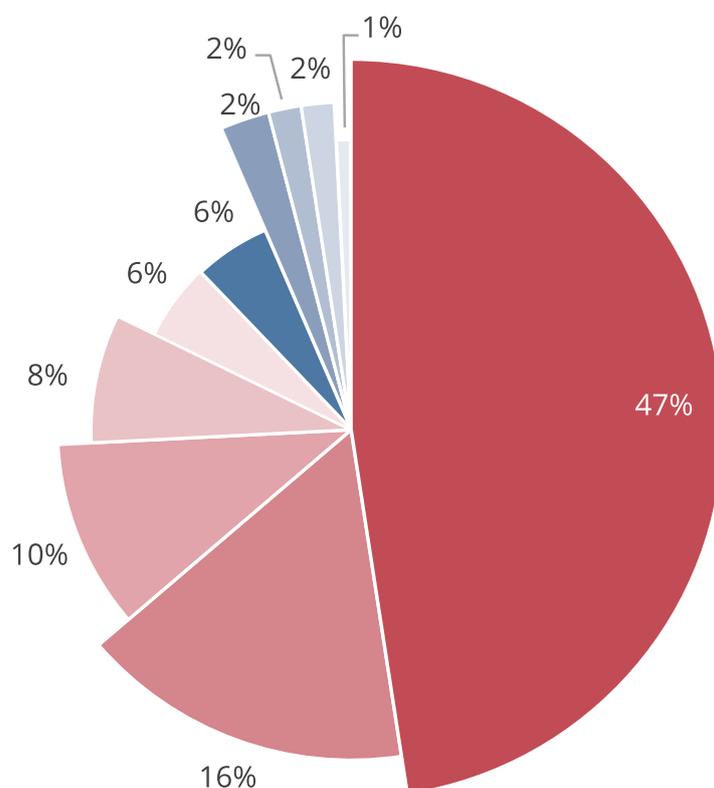
Applications filed during 2025, grouped by the subject matter of the application:

| Subject matter of the application | Applications filed |
|--|--------------------|
| Challenging judgments of courts of ordinary jurisdiction | 377 |
| Challenging judgments of courts of ordinary jurisdiction, as well violation of the right due to failure to adjudicate within a reasonable time | 59 |
| Incompatibility of laws (or their specific provisions) with the Constitution | 20 |
| Violation of the right due to failure to adjudicate within a reasonable time | 13 |
| Interpretation/correction/review of judgements of the Constitutional Court | 10 |
| Abolition of judgments of courts of ordinary jurisdiction together with the incompatibility of normative acts with the Constitution | 7 |
| Abolition of acts of public power | 7 |
| Abolition of decisions of the Council of Ministers as incompatible with the Constitution | 3 |
| Abolition of decisions of the Assembly of Albania | 2 |
| Conflict of competences | 2 |
| Termination of the mandate of a judge of the Constitutional Court | 1 |
| Total | 501 |

New applications filed according to the subject matter in %



New applications filed according to the object matter in %

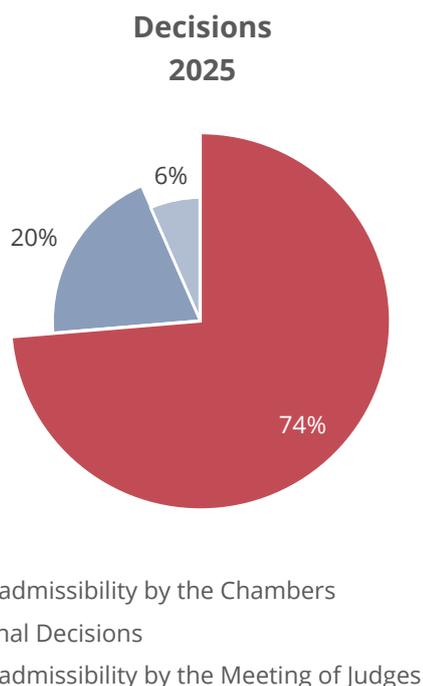


- Challenging the decisions of courts of general jurisdiction, together with the determination of the violation of a right as a result of failure to adjudicate within a reasonable time
- The incompatibility of laws (or specific provisions thereof) with the Constitution
- Determination of the violation of a right as a result of failure to adjudicate within a reasonable time
- Interpretation / correction / review of the decisions of the Constitutional Court
- Annulment of the decisions of courts of general jurisdiction together with the incompatibility of normative acts with the Constitution
- Annulment of acts of public authorities
- Annulment of the decisions of the Council of Ministers
- Annulment of the decision of the Albanian Parliament
- Conflict of competences
- Declaration of the termination of the mandate of a judge of the Constitutional Court

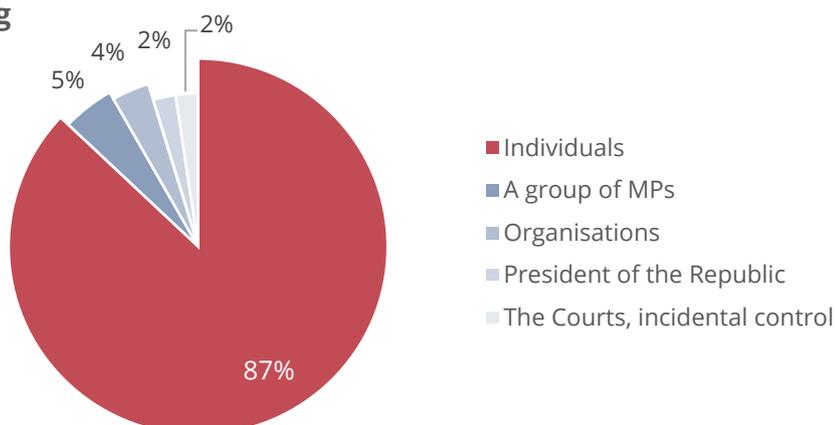
Decisions taken by the Constitutional Court

All decisions of the Constitutional Court are reasoned, including inadmissibility decisions, which are reasoned for the admissibility criteria.

| Type of decision | Number of decisions made |
|--|--------------------------|
| Inadmissibility Decisions by Chambers | 316 |
| Final Decisions | 85 |
| inadmissibility Decisions by the Meeting of Judges | 28 |
| Total | 429 |



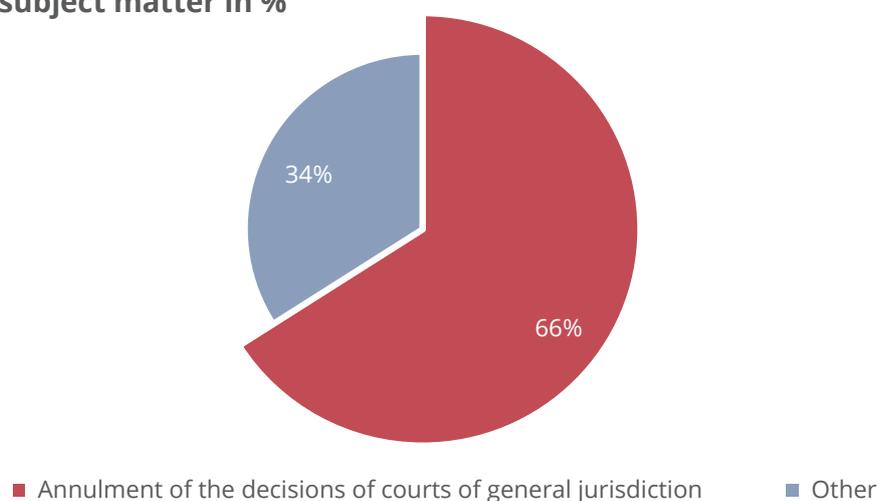
Final decisions according to subjects in %



| Final decisions grouped by subjects that set the Constitutional Court in motion: | Number of final decisions taken |
|--|---------------------------------|
| Individuals | 74 |
| Group of deputies | 4 |
| Non-profit organizations | 3 |
| President of the Republic | 2 |
| Ordinary courts (incidental control) | 2 |
| Total | 85 |

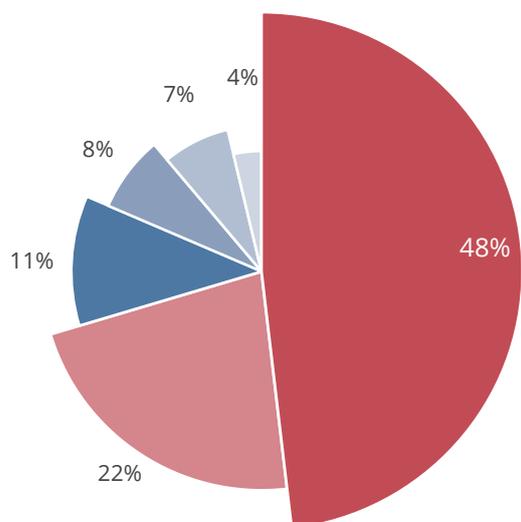
Final decisions grouped by subject of matter of the application:

Final decisions according to the subject matter in %



| Subject matter of the application | Number of applications filed |
|--|------------------------------|
| Annulment of decisions of ordinary courts | 56 |
| Annulment of decisions of ordinary courts, as well as violation of the right due to failure to adjudicate within a reasonable time | 13 |
| Incompatibility of laws (or their specific provisions) with the Constitution | 6 |
| Violation of law as a result of failure to adjudicate within a reasonable time | 3 |
| Correction/judicial expenses of decisions of the Constitutional Court | 2 |
| Abolition of decisions of the Council of Ministers as incompatible with the Constitution | 2 |
| Termination of the mandate of a judge of the Constitutional Court | 2 |
| Conflict of competences | 1 |
| Total | 85 |

Final decisions according to the Other subject matter in %

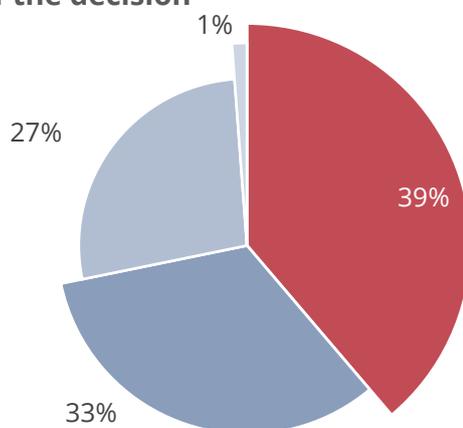


- Annulment of the decisions of courts of general jurisdiction and determination of the violation of a right as a result of failure to adjudicate within a reasonable time
- Incompatibility of laws (or their specific provisions) with the Constitution
- Determination of the violation of a right resulting from failure to adjudicate within a reasonable time
- Correction / judicial costs of the decisions of the Constitutional Court
- Annulment of the decisions of the Council of Ministers as incompatible with the Constitution
- Conflict of competencies

Final decisions taken during 2025, grouped by the disposition of the decision:

| Type of decision provision | Number of decisions |
|---------------------------------------|---------------------|
| Partial acceptance of the application | 33 |
| Acceptance of the application | 28 |
| Rejection of the application | 23 |
| Dismissal of the case | 1 |
| Total | 85 |

Final decisions according to the disposition of the decision

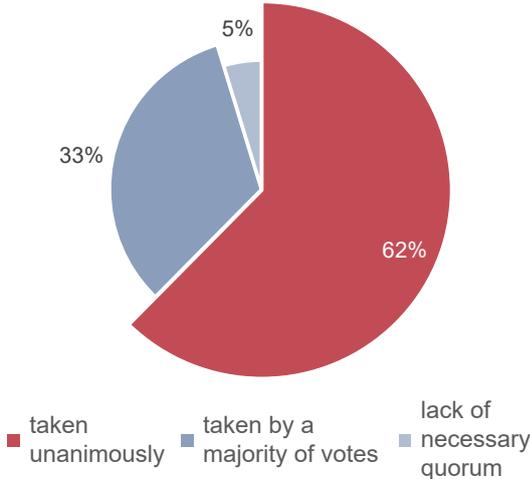


- Partial admissibility of the application
- Admissibility of the application
- Inadmissibility of the application
- Dismissal of the case

Final decisions made during 2025, grouped by voting method:

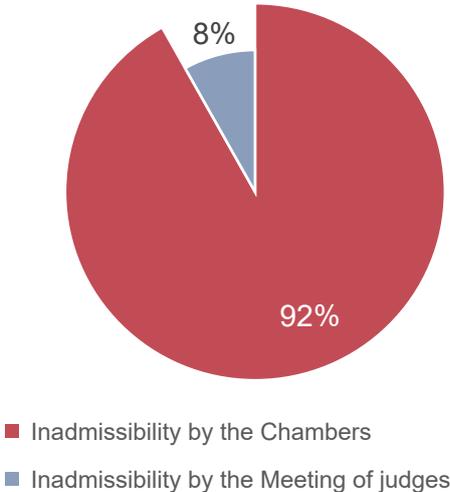
| Type of voting method | Number of decisions |
|-----------------------|---------------------|
| Unanimity | 53 |
| Majority of votes | 28 |
| No quorum | 4 |
| Total | 85 |

Final decisions according to the voting method



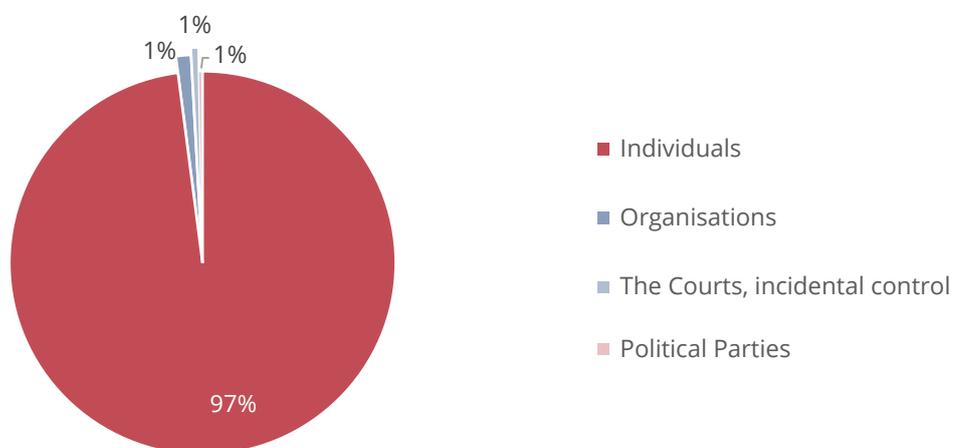
During 2025, the Constitutional Court has taken 344 inadmissibility decisions 2025, 28 by the Meeting of Judges and 316 by the Chambers of the Constitutional Court.

inadmissibility decisions 2025



Inadmissibility decisions taken during 2025, grouped by subjects that set the court in motion:

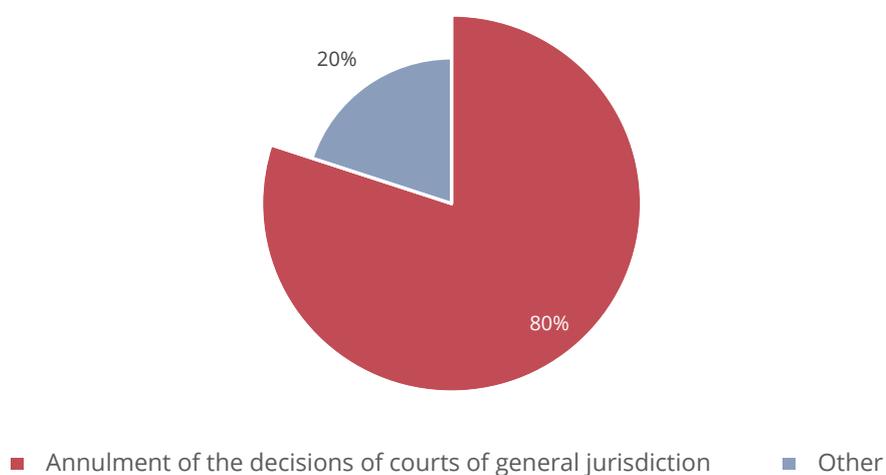
Inadmissibility decisions by subject



| Subjects who have filed a lawsuit | Number of Inadmissibility Judgements |
|--------------------------------------|--------------------------------------|
| Individuals | 337 |
| Non-profit organizations | 4 |
| Ordinary courts (incidental control) | 2 |
| Political parties | 1 |
| Total | 344 |

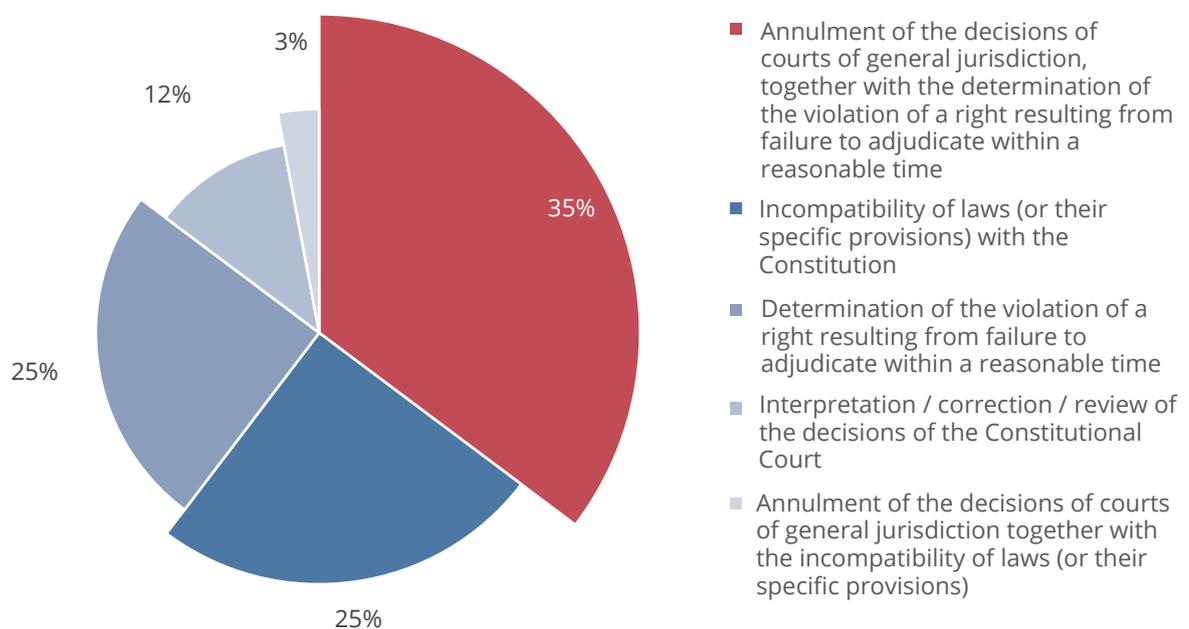
Inadmissibility decisions taken during 2025, grouped by subject matter of the application:

Inadmissibility decisions according to the subject matter in %



| Subject matter of the application | Number of inadmissibility decisions |
|--|-------------------------------------|
| Annulment of decisions of courts of ordinary jurisdiction | 276 |
| Annulment of decisions of courts of ordinary jurisdiction, together with a finding of violation of law as a result of failure to adjudicate within a reasonable time | 24 |
| Incompatibility of laws (or their specific provisions) with the Constitution | 17 |
| Entrenchment of violation of law as a result of failure to adjudicate within a reasonable time | 17 |
| Interpretation/correction/review of decisions of the Constitutional Court | 8 |
| Annulment of decisions of courts of ordinary jurisdiction together with the incompatibility of laws (or their specific provisions) | 2 |
| Total | 344 |

Inadmissibility decisions according to the Other subject matter in %



International perspective

Judicial Dialogue

In an increasingly interconnected legal and constitutional context, constitutional justice can no longer be conceived only within national borders. The challenges that constitutional courts face today, ranging from the protection of fundamental rights and freedoms and the rule of law to the preservation of democratic governance, are often shared between different jurisdictions and require continuous dialogue, mutual understanding and cooperation between courts at the international and regional levels.

The Constitutional Court of the Republic of Albania remains committed to strengthening cooperation with international and regional judicial partners, considering that comparative constitutional dialogue constitutes an essential component of modern constitutional adjudication. Participation in international networks, bilateral exchanges and multilateral forums has enabled the Constitutional Court of Albania to both contribute to and benefit from the collective experience of constitutional and supreme jurisdictions. This approach has promoted the convergence of constitutional standards, while maintaining in any case the respect for the national constitutional identity.

During 2025, particular importance was given to the practical implementation of the Mem-

orandums of Understanding signed between the Constitutional Court of Albania and sister courts. These institutional collaborations were concretized through the development of two working visits at technical and professional level, as exchanges between the respective structures of legal advisors and the directorate of studies. The first visit was organized at the Albanian Constitutional Court and the second visit at the Constitutional Court of Spain. These exchanges offered the opportunity to address various topics on constitutional jurisprudence, strengthening professional ties and facilitating the practical exchange of experience between the respective administrative staff.

The Court has also intensified its cooperation with the European Court of Human Rights (ECHR) through three study visits: two to the ECHR and one to the Department for the Execution of ECHR Judgments at the Council of Europe. The first two visits, carried out in May and July 2025 respectively, enabled judges and legal advisors to become more familiar with the latest positions and standards of the ECHR on issues and topics of mutual interest in compliance with the European Convention on Human Rights. The last visit carried out in December 2025, which focused on the execution of ECHR judgments, contributed to the harmonization of national constitutional practice with European human rights standards, as well as fostered the Court's effective participation in regional mechanisms for the monitoring and execution of constitutional decisions, consolidating its role within the broader European judicial framework.

International Partners

Cooperation with international partners and foreign assistance projects occupies an important place in the institutional activity of the Constitutional Court. It remains essential for the effective implementation of its strategic objectives and priorities. In this sense, the initiatives undertaken during 2025, demonstrated the Court's continuous efforts to strengthen this cooperation in order to increase the quality of constitutional jurisprudence.

With the support of the OSCE Presence in Albania and the assistance of the Konrad Adenauer Foundation, the Court finalized and published the second guide to its jurisprudence, which summarizes the decision-making of this court for the period 1992 - 2024 regarding the principles of law, the separation of powers, as well as substantive constitutional rights. The partners' support for this initiative came in continuation of the joint work on the realization of the first jurisprudence guide, presented in February 2024. Both of these publications constitute important tools for the knowledge of constitutional practice and for its systematization, making the Court's decision-making even more accessible, not only to researchers and academics, but also to all legal professionals.

Also, in partnership with the German Foundation for International Cooperation in Justice (IRZ), two study visits were organized to the European Court of Human Rights. Also, within the framework of this partnership, seminars were held in cooperation with the National Chamber of the Bar on the individual constitutional complaint, which contributed to the familiar-

ization of lawyers with the implementation of this mechanism in German and domestic jurisdiction.

In order to further modernize and improve case management, the Court deepened its cooperation with the Council of Europe Office in Tirana by working on a concrete project aimed at establishing a modern case management system and digitizing its archive, a project that is expected to be financed by the Swedish International Development Agency (SIDA). This project aims to increase administrative efficiency, improve institutional transparency, create a functional and accessible archive, and improve case traceability, contributing to increasing the efficiency of work processes.

Overall, the support of international partners during 2025 has been very important in terms of exchanging professional experiences with other jurisdictions, which helps harmonize work standards with European practices and further develop constitutional thinking. By systematically integrating comparative and European perspectives, the Constitutional Court confirms its commitment to protecting constitutionality and the fundamental rights and freedoms of citizens. In this sense, international cooperation will continue to play an important role in strengthening institutional capacities, advancing professional standards, and consolidating the role of the Court in the Albanian constitutional system.

International Representation and Cooperation

▀ *Preparatory Meeting of the Circle of Presidents of the Conference of European Constitutional Courts (CECC) – 28 February 2025, Tirana, Albania*

Within the framework of the presidency of the Conference of European Constitutional Courts (CECC) for the period 2024 - 2027, the Constitutional Court of Albania organized in Tirana the Preparatory Meeting of the Circle of Presidents, which is one of the leading and decision-making bodies of this Conference. During this meeting, organizational issues of the upcoming XX 20th Congress of the CECC, which will be held in Albania in 2027, were approved, determining the topic and date of the Congress, as well as other issues proposed by the member constitutional

courts. One of the most important moments of the preparatory meeting was the voting and acceptance by the majority of the member constitutional courts of the CECC of the request of the Constitutional Court of Kosovo for full membership in this organization, marking a historic moment for this court after a 14-year effort to be an integral part of the European network of constitutional courts.

This preparatory meeting constitutes an important step towards the success of the 20th Congress, strengthening the role of the Constitutional Court of Albania on the international stage and contributing to the development of constitutional justice in the region and in Europe.





▣ *The Constitutional Court of Albania participates in the 10th Congress of the Association of the French-speaking Constitutional Courts, 6 – 8 May 2025, Bucharest, Romania*

The Constitutional Court of the Republic of Albania is elected for the first time by the General Association of the French-speaking Constitutional Courts, convened within the framework of the 10th Congress of this association, as a member of its Bureau. The Bureau is one of the governing bodies of ACCF, which is composed of 10 member constitutional courts and is periodically renewed for a period of three years.

▣ *8th Meeting of the Supreme Courts Network (SCN), 5 – 6 June 2025, Strasbourg, France*

The Constitutional Court participated in the 8th meeting of the Annual Forum of the Superior Courts Network (SCN). The 2025 meeting was of particular importance as it marked the 10th anniversary of the establishment of the Courts Network, as well as the 75th anniversary of the European Convention on Human Rights. During the sessions, the importance of the Network in the effective implementation

of the European Convention on Human Rights was highlighted, as an effective platform for judicial dialogue for the exchange of knowledge and experience between courts and the ECHR. The participation of the Constitutional Court in this event was supported by the project “Improving the protection of the right to property and facilitating execution of ECtHR judgments in Albania (D-REX III)”, through the joint programme of the European Union and the Council of Europe “Horizontal Facility for the Western Balkans and Turkey”.





▣ *The Constitutional Court of Albania chairs the meeting of the CECC regional grouping in the framework of participation in the 6th Congress of the World Conference on Constitutional Justice – October 28, 2025, Madrid, Spain*

The 6th Congress of the World Conference on Constitutional Justice was preceded by meetings of regional and linguistic groupings of the member bodies and, in her capacity as President of the Conference of European Constitutional Courts, the President of the Constitutional Court of Albania chaired the meeting of the regional grouping of the CECC, as well as represented this regional grouping at the meeting of the Bureau of the World Conference.

During this meeting, the President of the Constitutional Court of Albania made a presentation of the activity of the CECC to date under the Presidency of the Constitutional Court of Albania and subsequently participated and represented the European Conference in the Bureau of the World Conference on Constitutional Justice, following the standings and



decision-making of the European courts. The Constitutional Court of Albania also participated in the meeting of the group of Francophone constitutional courts (ACCF), as a full member and member of the Steering Bureau of this Association.

▣ *The Constitutional Court of Albania participates in the 6th Congress of the World Conference on Constitutional Justice (WCCJ), 28 - 30 October 2025, Madrid, Spain*

The Constitutional Court participated in this Congress in two capacities, as President of the Conference of European Constitutional Courts (CECC) and as a member of the Bureau of the World Conference on Constitutional Justice.

Under the main theme of this Congress, “Human Rights of Future Generations”, the participating courts addressed and analyzed in the context of constitutional justice the individual and collective dimensions of intergenerational justice, such as the preservation of the environment and natural resources, the protection of the cultural heritage of humanity, access to scientific knowledge and new technologies, as well as judicial independence.

▣ *The Constitutional Court of Albania participates in the 3rd Annual Meeting of the Balkan Constitutional Courts Forum (BCCF), Antalya, Turkey, 14 - 15 November 2025*

The 3rd Annual Meeting of the Balkan Constitutional Courts Forum was organized under the



auspices of the Constitutional Court of Turkey and was attended by representatives of the Forum’s member courts, judges of the ECHR, as well as other invited local and international courts and personalities. A special session was also dedicated to discussions on the technical and organizational aspects of the Forum.

The Constitutional Court of Albania was represented at this event by Judge Sonila Bejtja, who also gave a presentation at the International Conference that took place on this occasion, on the topic: “Standardization of human rights and the role of constitutional justice”.

▀ The Constitutional Court of Albania participates in the roundtable within the framework of the Balkan Constitutional Courts Forum, December 8, 2025, Pristina, Kosovo

Constitutional Court of Albania participated in the event: “Challenges and best practices in communicating high-profile decisions of constitutional courts: A comparative analysis”, which was organized with the support of the Council of Europe Office in Kosovo, within the framework of the activities of the Balkan Constitutional Courts Forum. The event was attended by Secretaries General and representatives of administrative staff covering public and media relations from the Constitutional Courts of Albania, Bulgaria, North Macedonia,

Turkey, Kosovo, as well as a special guest from the Constitutional Court of the Czech Republic.

The common denominator of the discussions was the courts’ effort to respect the principles of transparency, impartiality and institutional independence, as well as to best adapt to new communication technologies.

▀ Study visit of advisors of the Legal Service Unit and the Directorate of Legal Research, Studies and Publications of the Constitutional Court of Albania to the European Court of Human Rights, 6 – 7 May 2025, Strasbourg, France

This visit was organized with the support of the German Foundation for International Legal Cooperation (IRZ), as well as in coordination with the Office of the elected judge to the European Court of Human Rights in respect of Albania, Mr. Darian Pavli. During the visit, the partici-



pants had the opportunity to hear from ECtHR experts on the jurisprudence and the Court's positions regarding some of the rights guaranteed by the European Convention on Human Rights. They were also informed about the procedure for examining cases, about the innovations of the search methodology on ECtHR platforms such as HUDOC and Knowledge Sharing, as well as discussed the standings of the ECtHR regarding some of the topics of interests related to Albania and especially some aspects of constitutional review.

▣ *Visit of Constitutional Court judges to the European Court of Human Rights (ECHR), 3 – 4 July 2025, Strasbourg, France*

The purpose of the visit was to strengthen inter-institutional cooperation and exchange best practices regarding the protection of fundamental rights and freedoms of the individual. The visit was carried out in cooperation with the Office of the elected judge to the European Court of Human Rights in respect of Albania, Mr. Darian Pavli, and with the support of the German Foundation for International Legal Cooperation (IRZ), through funds from the German Federal Foreign Office.

▣ *Visit of the judicial troupe of the Constitutional Court to the Faculty of Law of the University of Bari, Italy, 17 – 18 July 2025*

Within the framework of this visit, the court delegation was welcomed at the premises of the Rectorate of the University of Bari by Prof. Andrea Lovato, Director of the Department of Jurisprudence, and other professors of constitutional law, to continue with the sessions of presentations and discussions on the topics: *“Intersections between Italian jurisprudence and that of the Constitutional Court of Albania”* and *“Incidental Control”*. The delegation also visited the Faculty of Economic Sciences of the University, during which discussions were held on issues of common interest in the field of constitutional law, as well as on the progress of the comprehensive reform in justice in Albania, underlining the importance of continuous



dialogue between courts and academic institutions for the development of legal thought and the improvement of constitutional practices.

▀ *Study visit of the delegation of the Constitutional Court of Albania to the Constitutional Court of Spain, Madrid, 11 – 12 September 2025*

Within the framework of the implementation of the mutual cooperation agreement in areas of common interest, signed with the Constitutional Court of the Kingdom of Spain in March 2024, a delegation of the Constitutional Court of Albania conducted a study visit to the Constitutional Court of Spain.



During the study visit, several working sessions were held on various topics of interest to both courts. The legal advisors of the Constitutional Court of Spain shared with the representatives of the Albania the standings and jurisprudence of their court on several topics, especially on individual constitutional complaints.

▀ *Study visit of representatives of the Constitutional Court of Albania to the Council of State of Greece, Athens, November 27, 2025*

Following the very good relations of cooperation with the Council of State of Greece, a delegation of the Constitutional Court of Albania conducted a study visit to this institution, the focus of which has been the discussion on the cooperation to date and the ways of deepening this cooperation in the future. Also, the Albanian delegation was received in a special meet-



ing by the President of the Council of State of Greece, Mr. Michail Pikramenos, and had the opportunity to get to know more closely the role, structure and functions of the Council of State of Greece. The meetings held with the counterparts served also to exchange relevant experiences between the two constitutional institutions.

▀ *Working visit of judges of the Constitutional Court to Strasbourg, France, 8 – 9 December 2025*

A delegation of the Constitutional Court of Albania, composed of judges and legal advisors, conducted a working visit to the Department for the Execution of Decisions of the ECtHR. The purpose of this working visit, which was organized also with the support of the Council of Europe, was to exchange positions and views with representatives of the Department for the Execution of Judgments of the ECtHR, the Secretariat of the Committee of Ministers, the Parliamentary Assembly, the European



Commission for the Efficiency of Justice (CEPEJ) and the Directorate General for Human Rights and the Rule of Law of the Council of Europe, regarding the execution of ECtHR judgments for Albania, the identification of best practices, as well as the challenges related to the process of execution of judgments and constitutional justice in general.

As part of this visit, the Constitutional Court delegation held also a working meeting with the judge elected to the European Court of Human Rights in respect of Albania, Mr. Darian Pavli, during which they discussed the strengthening of judicial dialogue, the role of the Constitutional Court as a preliminary filter of applications addressed to the ECtHR, as well as the contribution of both courts in guaranteeing the fundamental rights of individuals.

▀ *Opening Ceremony of the Judicial Year 2025 of the Supreme Court of Cassation of Italy, Rome, 23 – 24 January 2025*

The President of the Constitutional Court of the Republic of Albania participated in the activities held on the occasion of the opening of the judicial year of the High Court of Cassation, within the framework of which, representatives of the Albanian state held meetings at the Constitutional Court and the High Court of Cassation. During these meetings, the strengthening of inter-institutional cooperation and dialogue was discussed, further deepening the excellent relations between our two countries. The Constitutional Court of Albania expressed its read-



iness to share experiences and best practices, taking into account the closeness and similarity between our two constitutional and legal systems, as well as the related cultural aspects.

▀ *Opening Ceremony of the 2025 Judicial Year of the European Court of Human Rights, Strasbourg, France, 31 January 2025*

As part of these activities, a seminar was held on the topic of “The Protection of Human Rights in the World of Artificial Intelligence, Algorithms and Megadata (Big Data)”, which was followed by the Solemn Session of the Opening of the 2025 Judicial Year of the European Court of Human Rights. This is one of the most important events in the calendar of European justice, which brings together presidents and senior representatives of constitutional and supreme courts from various member states of the Council of Europe.



▀ *Agreement signing ceremony “World Law Congress 2027”, Madrid, Spain, 7 – 8 February 2025*

The President of the Constitutional Court of Albania participated in the ceremonies foreseen on the occasion of the awarding of the Premio Espanol Universal 2024 to Mr. Javier Cremades, President of the World Association of Jurists (WJA), in recognition of his outstanding contribution to the international promotion of Spain and the Spanish legal community. As part of the award ceremony, an audience was held with the King of Spain, His Majesty Felipe VI. During the audience, the agreement for the “World Congress of Law 2027”, which will be held in Tirana, was signed in a special ceremo-



ny, to bring together experts from all over the world, as an excellent opportunity to exchange knowledge, strengthen international cooperation and promote the democratic values of the rule of law.

▀ *Third Gender Equality Forum for the Western Balkans, March 7, 2025, Skopje, North Macedonia*

The Judge of the Constitutional Court of Albania, Ms. Marjana Semini, participated in the Third Gender Equality Forum for the Western Balkans, organized by the Aire Center with the support of the Government of the United Kingdom, and in cooperation with the United Nations Mission in Kosovo. Discussions during this Forum focused on the role of the judiciary in advancing gender equality, in particular in addressing gender-based violence, challenging stereotypes in judicial reasoning and combating discrimination. Emphasis was also placed on the need for the effective implementation of the standards and latest jurisprudence of the European Court of Human Rights, as well



as strengthening the institutional approach to the protection of women’s rights.

▀ *International Conference organized by the Constitutional Court of Latvia, Riga, April 25, 2025*

The Constitutional Court of Albania participated in the international conference on the topic: “The role of constitutional courts in strengthening common European values in the face of contemporary challenges,” within the framework of the project “Support for the development of constitutional justice in Ukraine”, and implemented as part of Phase III of the Joint Programme of the European Union and the Council of Europe “Partnership for Good Governance”.



▀ *63rd Anniversary of the Constitutional Court of Turkey, Ankara, 25 – 26 April 2025*

The activities organized on the occasion of this anniversary included a dedicated session and the opening ceremony of the festive activities, as well as the international symposium on the topic “The Future of Constitutional Justice in the 21st Century”.





▣ *150th Anniversary of the Federal Tribunal of Switzerland, Lausanne, 15 – 16 May 2025*

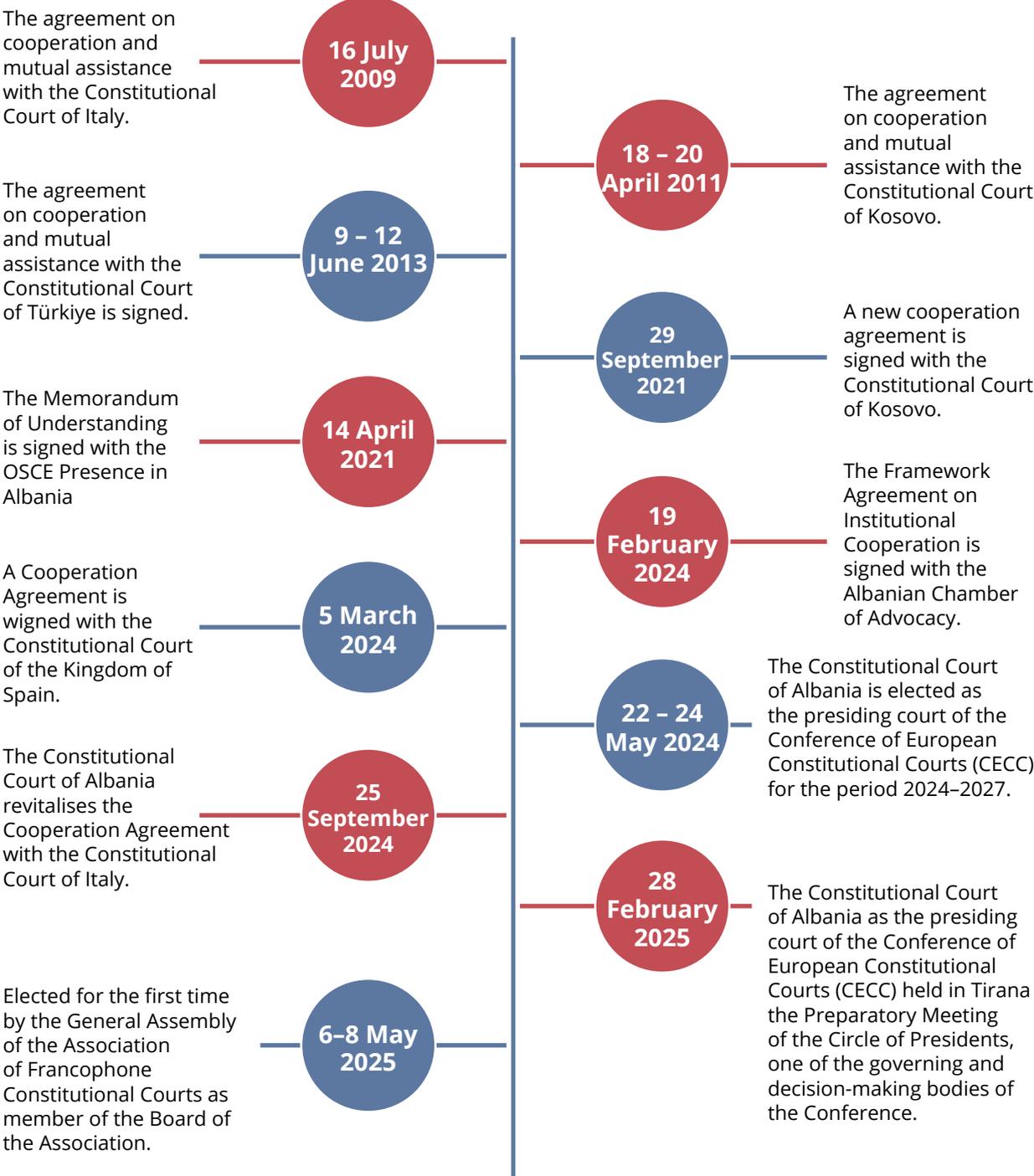
On the occasion of this important anniversary, the Swiss Federal Tribunal organized a Scientific Symposium with judges and legal academics as speakers, which addressed various issues such as: The Federal Tribunal: a driving force that drives society forward or a reflection of this society; rules of procedure that impede access to a constitutional judge; the perspective of the ECHR on the exhaustion of domestic legal remedies; recognition of unwritten fundamental rights; the role of the judge - spokesman of the law or creator of praetorian law; etc.

▣ *29th World Congress of Law, Santo Domingo, Dominican Republic, 5 – 8 May 2025*

At the invitation of World Law Foundation & World Jurist Association, a delegation of the Constitutional Court of the Republic of Albania participated in the 29th World Congress of Law, which was organized with several discussion tables where there were references from different panelists from all over the world. Representatives of the Constitutional Court moderated and referred in some of the panels. The President of the Constitutional Court led the panel entitled: “Constitutional Justice in Comparative Perspective I”; Judge Sonila Bejtja led the panel entitled: “Constitutional Conflicts of Jurisdiction between the Central and Federal Governments”; Judge Gent Ibrahimiri referred to the panel entitled: “Implementation of Constitutional Court Decisions”.



Important Dates for International Cooperation



Activities within the country

Meeting of the judges of the Constitutional Court of Albania with the EU Ambassador to Albania, H.E. Silvio Gonzato, 6 March 2025

The Constitutional Court of Albania's judges held an official meeting with the Head of the European Union Delegation to Albania, Ambassador Silvio Gonzato. Emphasizing the importance of the successful implementation of reforms, as well as the level of interaction with public authorities, Ambassador Gonzato expressed his positive assessment of the activity of the Constitutional Court, which since its establishment, in a short time, has issued twice as many decisions compared to a few years ago, thus increasing public trust. Ambassador Gozato also highlighted that assuming the Presidency of the CECC is a very important factor for Albania, as this will enable the creation of a network with European courts that have previously gone through integration processes for the recognition and implementation of the *acquis communautaire*.



Roundtable with representatives of the Constitutional Court of Italy, March 21, 2025

The Constitutional Court held a roundtable discussion on the topic: "Further advancement of legal research and reasoning for effective and qualitative constitutional decision-making".

This event brought together legal advisors of the Constitutional Court of Albania as well as representatives of the Constitutional Court of Italy to share experiences and advanced practices in the field of legal reasoning and constitutional scientific research.



Training seminar for legal advisors of the Constitutional Court, April 11, 2025

As part of the exchange project between the Judicial Office of England and Wales and the School of Magistrates in Albania, with the support of the British Embassy in Tirana, a training seminar was held with the legal advisors of the Constitutional Court on the writing and legal reasoning of judicial decisions and the use of precedent. The seminar was moderated by three British distinguished justices with experience in different areas of law, Mrs. Jus-



tice Eady, HHJ Keith Raynor and District Judge Sufiyan Rana.

The topics covered during this training seminar were: *Practical rules for writing and reasoning court decisions; as well as the methodology applied for the use of precedents and the reference of precedents in common law.*

▀ *Visit of lecturers and students of the Faculty of Law to the Constitutional Court, April 24, 2025*

The Constitutional Court welcomed to its premises the Deputy Dean of the Faculty of Law at the University of Tirana, Prof. Assoc. Dr. Erion Muharremaj, Prof. Dr. Aurela Anastasi, lecturers and students of this faculty. The purpose of the meeting was to present the project undertaken by the Department of Public Law entitled “Approximation of legislation with European standards through constitutional adjudication”, implemented with the support of the National Agency for Scientific Research and Innovation.



▀ *10th International Conference on Human Rights, 13 June 2025*

The Constitutional Court participated in the 10th International Conference on Human Rights on the theme “The New Frontiers of Human Rights: Rights of the New Generation and the Role of Constitutional Democracy”, organized on June 13, 2025 by the Mediterranean University of Albania. The conference brought together academics, lawyers and decision-makers from different countries to share ideas, experiences and visions for the future on this very current and universal topic.



▀ *25th anniversary of Ombudsman’s institution, June 24, 2025*

The Constitutional Court participated in the Conference on “National and International Structures for the Protection of Human Rights: Good Practices and Lessons Learned”, organized within the framework of this anniversary, appreciating the vital role of this institution in the protection of the fundamental rights and freedoms of the individual.



▣ *Presenting the Guide of the Jurisprudence of the Constitutional Court between 1992 and 2024 (Volume II), July 14, 2025*

The Constitutional Court of Albania organized the presentation ceremony of Volume II of the Guide of the Jurisprudence of the Constitutional Court, a publication of particular importance, which summarizes the decision-making of this court for the period 1992 – 2024 regarding the principles of law, the separation of powers, as well as substantive constitutional rights. This publication follows Volume I of the Guide of the Jurisprudence on individual constitutional complaints (1998–2023), presented in February 2024. These publications will serve as a valuable resource not only for legal scholars, but also as important instruments aiding almost all actors of the justice system, and especially judges.

The event was attended by dignitaries from independent institutions, justice institutions, the judicial system, lawyers, academics and legal



professionals, ambassadors and representatives of international partner organizations.

▣ *Council of Europe's activity, 25 September 2025*

The Constitutional Court participated in the activity organized by the Council of Europe to present the project: “Enhancing the capacities of the judiciary for the better implementation of the standards of the right to freedom and security in Albania”. This activity was attended by senior heads of state institutions, representatives of justice bodies, ambassadors, representatives of international organizations and experts in law and human rights.



▣ *Meeting of the judges of the Constitutional Court of Albania with the delegation headed by the President of the Supreme Court of the Netherlands, October 1, 2025*

The panel of judges of the Constitutional Court of Albania held a meeting with the delegation headed by the President of the Supreme Court of the Netherlands, Ms. Dineke de Groot, as part of the several-day visit that the Dutch delegation carried out in Albania to intensify the judicial dialogue in the framework of the process of Albania’s accession to the European Union. The parties exchanged views on the role of the constitutional and high courts in their respective systems, as well as on the limits and



overlaps of jurisdictions between them during the interpretation of the Constitution and laws.

▣ *International conference on the occasion of 30 years of partnership with the Council of Europe and the Venice Commission, 20 - 21 October 2025*

The Constitutional Court participated in the international conference on “30 years of partnership and progress: Albania, the Council of Europe and the Venice Commission”, which was organized under the auspices of the Assembly of Albania, in cooperation with the Venice Commission and the Council of Europe. The conference provided an opportunity to review the progress made by Albania on its path of reforms and the contribution of the Council of Europe and the Venice Commission to improving the country’s constitutional and legal framework. In her welcoming speech, the President of the Constitutional Court emphasized the importance of continued cooperation with the Venice Commission and the role of this partnership in strengthening the rule of law in Albania.



▣ *Workshop on the implementation of measures taken during 2025, 18 - 19 December 2025*

The Constitutional Court, in cooperation and with the support of international partner organizations – the OSCE Presence in Albania and the Konrad Adenauer Foundation (KAS) – organized a working roundtable to discuss the Action Plan for the implementation of the Court’s Institutional Strategy for the period 2024-2026, and specifically, the progress of the implementation of the measures planned within this action plan. The event was attended by the Secretary General of the Constitutional Court, Mr. Eugen Papandile, representatives of the Legal Service Unit and the management structures of the Court, as well as representatives of partner organizations, Ms. Luljeta Krasniqi, local legal advisor at the OSCE Presence Office, and Ms. Zheni Korçari, program coordinator of KAS Foundation.



