



ONLINE ACTIONS, OFFLINE HARMS:

Case studies on Gender
and Cybersecurity in the
Western Balkans

By the Western Balkans Cybersecurity Research Network

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INTRODUCTION

Framing gender and cybersecurity in six Western Balkan economies

By Ena Bavčić
DCAF

Good governance in cybersecurity is much like any other aspect of security sector governance, in that it must centre human security as a core guiding principle.¹ This holistic approach to cybersecurity governance opens space to deepen understandings of cybersecurity systems and their effects on states and citizens. Security sector reform (SSR) has also come to include the mainstreaming of gender in all areas of security governance, as awareness grows about how experiences of security impact people of different genders differently, as well as how women, girls, and people in the LGBTQ+ community have historically been excluded from playing significant roles in security and peace processes. Hence, organizations that address security on an international level, such as the UN, the OSCE, and others, including DCAF, have developed educational programmes and toolkits to support the mainstreaming of gender in national SSR agendas.²

This re-definition of security sector governance that has emerged by incorporating gender and acknowledging gender inequality in the traditional security sector pertains just the same to cybersecurity spaces. In fact, “[g]endered experiences of insecurity, gendered assumptions about security, and gender parity in participation in security governance – are all relevant to cybersecurity.”³ The challenge, however, is that no real consensus exists as to what cybersecurity is and to whom cybersecurity governance mechanisms apply.⁴

The European Union Agency for Cybersecurity (ENISA) has adopted a very broad definition of cybersecurity, as “security of cyberspace,” where cyberspace itself refers to the set of links and relationships between objects that are accessible through a generalised telecommunications network, and to the set of objects themselves.⁵ But as it is humans who inhabit this space, it is important to apply human-centric approaches within it and human-centric definitions to it. Sociologist PJ Rey has called cyberspace “the ‘place’... [t]he indefinite place out there, where... two human beings, actually meet and communicate.”⁶ And Mitra and Schwartz have noted that “the constructs of place and space are being reshaped as [people] are compelled to spend time in cyberspace.”⁷ This means that we should not aim for the security of cyberspace but security in cyberspace. We must also mainstream gender into cybersecurity, so as not to “reflect and reinforce pre-existing patterns of (intersectional) gender inequality, including GBV, and have the potential to create new ones.”⁸

1 Franziska Klopfer, *Cyber Violence against Women and Girls in the Western Balkans: Selected Case Studies and a Cybersecurity Governance Approach* (Geneva: DCAF, 2021).

2 One example is the *Gender and Security Toolkit* developed by DCAF, OSCE, and UN Women (available at: <https://www.dcaf.ch/gender-and-security-toolkit>). Many initiatives of the Toolkit have been implemented, and some are discussed in coming chapters.

3 Katharine Millar, James Shires, and Tatiana Tropina, *Gender Equality, Cybersecurity, and Security Sector Governance: Understanding the role of gender in cybersecurity governance* (Geneva: DCAF, 2023), 3.

4 In 2015, the European Union Agency for Cybersecurity (then, the European Union Agency for Network and Information Security, or ENISA) published a report discussing various conceptions of cybersecurity. See: *ENISA, Definition of Cybersecurity – Gaps and overlaps in standardisation* (2015).

5 *Ibid.*, 30.

6 PJ Rey, “The Myth of Cyberspace,” *The New Inquiry*, 13 April 2012, <https://thenewinquiry.com/the-myth-of-cyberspace/>. Similarly, Britannica notes that, in the 1990s, cyberspace came to refer to a “location” in which people interacted with each other while using the Internet.” See: Jennifer Bussell, “cyberspace,” *Britannica*, 12 March 2013, <https://www.britannica.com/topic/cyberspace>.

7 Ananda Mitra and Rae Lynn Schwartz, “From Cyber Space to Cybernetic Space: Rethinking the Relationship between Real and Virtual Spaces,” *Journal of Computer-Mediated Communications* 7, no. 1 (2001).

8 Millar, Shires, and Tropina, *Gender Equality, Cybersecurity, and Security Sector Governance*.

Any lack of definitional clarity regarding cybersecurity represents an opportunity to further improve cybersecurity infrastructure, so that it works optimally not only for technology and networks but for the humans who act as its creators and users. But this ambiguity also presents greater openings for malicious uses of the internet, which affects different groups and individuals in society differently. And as research by DCAF on cybersecurity and human rights in the Western Balkans has demonstrated, violations to human rights in the online world can manifest as threats to security in the offline world, posing a fundamental challenge to democratic principles.⁹

This research has also found that specially designed cyberattacks, such as those resulting in data leaks for example, can directly impact citizen users by exposing their private information.¹⁰ Even rudimentary malware can result in the exposure of private data, in violation of individual rights. But this kind of data exposure may produce different and specific physical and psychological outcomes for people and groups that already face discrimination, such as women and children, the LGBTQ+ community, Roma, and others. For example, in a society where bias against LGBTQ+ people is prevalent, there is a considerable risk that exposing their private information through digital means could translate into serious physical violence. Yet, because some groups in society, including women, are often more dependent on the internet for their income, it can be hard for them to avoid cyberspaces, and thus cyberviolence.¹¹

In fact, women and girls face a range of consequences when they lack access to the internet, from decreased physical safety, to professional and economic constraints, to limitations on their educational advancement.¹² In other words, they cannot simply “disconnect” to steer clear of the abuse they face online. Efforts in gender mainstreaming must therefore go beyond addressing the “gender workforce gap” to consider how insecurity in cyberspace affects users of different genders, and other groups, as well as how online threats and violence spill over into the real world. One entry point for this is the Istanbul Convention. By committing to the Convention, states have opened space for discussion of gender-based violence (GBV) generally, including in online spaces, and its effects on women, girls, and members of the LGBTQ+ community. Thus, UN Women has undertaken efforts to highlight a range of technology-facilitated threats to different groups.¹³ These include, but are not limited, to: non-consensual intimate image distribution (including the use of AI technology, such as deepfakes and virtual reality), cyber harassment and abuse, stalking and monitoring, device and app control, public disclosure of private information and doxing,¹⁴ impersonation, threats of violence, hate speech, misinformation and disinformation, defamation, astroturfing,¹⁵ and more.¹⁶

⁹ Franziska Klopfer, Ena Bavic, and Laylo Merali, *Cybersecurity and Human Rights in the Western Balkans: Mapping governance and actors* (Geneva: DCAF, 2021), 129.

¹⁰ Ibid., 14–17, and 97.

¹¹ Deborah Brown and Allison Pytlak, *Why Gender Matters in International Cyber Security* (Women's International League for Peace and Freedom and the Association for Progressive Communications, 2020), 6–7.

¹² Ibid., 8–11.

¹³ UN Women, “Frequently asked questions: Tech-facilitated gender-based violence,” <https://www.unwomen.org/en/what-we-do/ending-violence-against-women/faqs/tech-facilitated-gender-based-violence>.

¹⁴ Doxing refers to the practice of exposing previously private, personal information about an individual or organization.

¹⁵ Astroturfing refers to the practice of masking opinions or comments that are published on the internet or in the media, to make it seem as though they come from everyday members of the public when they actually originate from a company or political group, to create the appearance of broad popular or “grassroots” support for or agreement with a message.

¹⁶ The Global Partnership for Action on Gender-Based Online Harassment and Abuse, *Technology Facilitated Gender Based Violence: Preliminary Landscape Analysis* (Social Development Direct, 2023).

It is this threat environment that motivated this publication, which is aimed at contributing to a greater understanding of and providing a foundation for human-centric approaches to cybersecurity, and follows up on earlier research that was also undertaken by the Western Balkans Cybersecurity Research Network. The goal of the Network is to advance human-centric approaches to good cybersecurity governance. The first study in this series, *Cybersecurity and Human Rights in the Western Balkans*, published in 2021, sought to show how cybersecurity intersects with human rights in the region. It included recommendations as to how different economies may integrate human rights principles into their cybersecurity agendas, as well as how cybersecurity should be made more central in efforts to tackle human rights abuses.¹⁷ Where that study concentrated more on mapping areas of concern and relevant stakeholders, though, this research on gender and cybersecurity brings a focus to some of the most disturbing issues identified in that mapping process.

Therefore, the primary objective in this second study is to identify how cyberspaces can be more safe and secure for women, girls, and the LGBTQ+ community. The starting point for this research was the premise that this requires a clear view of the main threats to these groups in online spaces, as well as what motivates perpetrators. Beyond this, researchers set out to explore how existing solutions and approaches can be adapted to the regional (Western Balkan) context, and the roles different stakeholders will need to play in implementing them. The result is six chapters, analysing gender and cybersecurity in six Western Balkan economies, which describe how women and LGBTQ+ people have been pushed out of online spaces by abuses that violate their rights.

Unavoidably, this research reflects on deeply embedded patriarchal norms in the Western Balkans and demonstrates the implication of these norms in cyberspaces, where they are evident in the treatment of women, girls, and LGBTQ+ people. In other words, these norms have the same effect online as they do offline; and as the boundary between these spaces grows more indistinct, gendered violations in each will cross over into the other. Hence, researchers in Albania, BiH, Kosovo*, Montenegro, and North Macedonia explored the forms and effects of online violence on women and girls, in both cyberspace and the real world; while researchers in Serbia analysed how anti-LGBTQ+ narratives in online spaces are impacting the legal realization of LGBTQ+ rights in the country.

These researchers were given the option to explore the topics most relevant in their respective economies, and the fact that they all focused on similar concerns demonstrates how widely and systematically women, girls, and LGBTQ+ people are being pushed out of cyberspace. In every case presented here, this has constrained the online presence of these groups and has sometimes constrained their offline lives as well. Specifically, the papers produced by this research highlight the following issues:

*This designation is without prejudice to positions on status, and is in line with UNSC 1244 and the ICJ Opinion on the Kosovo declaration of independence

¹⁷ See: Klopfer, Bavicic, and Merali, *Cybersecurity and Human Rights in the Western Balkans*.

- In **Albania**, **Megi Reçi and Sara Kelmendi of the Institute for Democracy and Mediation (IDM)** discuss how the voices of women human rights defenders (WHRD) are being silenced by online abuse. They explore patterns of online violence by analysing survey responses, interviews, and focus group findings, including from the previous study in this series, to offer a vivid picture of the extent to which cyber-civic space is shrinking for WHRDs in this economy.


- In **BiH**, **Aida Mahmutović and Aida Trepanić of the Balkan Investigative Reporting Network (BIRN BiH)** highlight the case of a young woman who has been subjected to non-consensual intimate image distribution (NCIID). Her case underscores how such abuse can persist even when there has been a judicial response, and the long-term psychological effects of this violation on survivors; demonstrating the need for a more systematic approach to online GBV.

- In **Kosovo**, **Lulzim Peci, Valdrin Ukshini and Viola Kastrati of Kosovar Institute for Policy and Research and Development (KIPRED)** draw attention to the response of domestic judicial institutions to cases of non-consensual intimate image (NCII) abuse, analysing the legislative basis to prosecute these cases in Kosovo and how the judiciary has responded, to date. They also examine the causes of NCII abuse within the Kosovar social context, and the effects of this abuse on survivors.

- In **Montenegro**, **Milica Kovačević and Darvin Murić of the Center for Democratic Transition (CDT)** articulate how online spaces are being used to silence the voices of women in public life. Their study expands on what we know about the online abuse of female politicians in this economy by also exploring violations against female activists and journalists, and all women in the public domain. They describe different kinds of online abuse, and demonstrate that no woman is immune to online GBV.

- In **North Macedonia**, **Mila Josifovska Danilovska, Vesna Radinovska, and Despina Kovachevska of the Metamorphosis** outline the gendered components of online hate speech, and examine discrepancies between the treatment of online hate speech and other forms of hate speech by authorities in North Macedonia. They found that women, girls, and members of the LGBTQ+ community have low levels of trust in these authorities, and in state institutions, to properly handle cases of online hate speech, and they call for stronger protections for these groups.

- In **Serbia**, **Maja Bjeloš and Ivana Ranković of the Belgrade Centre for Security Policy (BCSP)** analyse the emergence and development of discriminatory narratives LGBTQ+ Pride events in Serbia, and how cyberspace has provided them fertile ground, affecting the rights of LGBTQ+ people both online and offline. Using the example of EuroPride, which took place in Belgrade in 2022, the authors demonstrate how digital spaces are being used as mobilizing tools by various anti-rights movements in this economy.



Together, these separate research endeavours complement each other by taking different perspectives on the matter of gender and cybersecurity. Though they capture findings in specific contexts, many of the conclusions drawn in the chapters that follow are universal and can be read as a part of a general analysis of how online GBV affects the degree to which women, girls, and people of non-conforming gender identities experience safety and security in cyberspace. Accordingly, many recommendations herein can also be universalized and applied across contexts.

CHAPTER 3

Accessing justice for online violence:

**The law and non-consensual intimate image
distribution in Kosovo**

By Lulzim Peci, Valdrin Ukshini and Viola Kastrati

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Introduction

Taking or distributing intimate images without the subject's consent is nothing new, and has been happening since the camera was invented. But advancements in computer technology – the internet and search engines, peer-to-peer file sharing, social networking, smartphones and mobile apps, and artificial intelligence – have made the distribution of non-consensual intimate images (NCII), potentially to large numbers of people, a matter of considerable concern around the world.¹ And while every state addresses cases related to NCII according to their own national legal frameworks and institutions, many victims confront personal and legal challenges when seeking justice, often stemming from local social norms.² These include the various psychological effects that can result from the violation of NCII abuse.³

In Kosovo, state authorities are obliged to comply with the provisions of the Istanbul Convention.⁴ These provisions require parties to the Convention to take essential measures to promote changes in the social and cultural patterns of both women and men to eliminate biases, customs, traditions, and other practices grounded in the concept of women's inferiority or in stereotypical gender roles. Additionally, acts of violence covered by the scope of this Convention cannot be justified based on culture, custom, religion, tradition, or “honour”.⁵ Provisions of the Convention also oblige states to take measures to ensure that law enforcement and judicial authorities are properly trained to investigate and prosecute cases of violence against women, including cases involving NCII.⁶

This research examined the issue of NCII abuse in Kosovo through the lens of legal and social norms. It starts by reviewing the relevant legal framework, and identifies several deficiencies. Then, 55 verdicts handed down by Kosovo courts in cases involving non-consensual intimate images are analysed. These span from the first recorded case in 2016, to a case decided at the end of 2022. This is followed by a discussion of the ways that pervasive patriarchal norms in Kosovo hinder the fair treatment of victims of NCII abuse by law enforcement, contributing to the social and psychological distress these victims experience. Finally, the primary findings of this research are summarized, and specific recommendations are put forth for consideration by Kosovar institutions.

1 Nicola Henry, et al., *Image-Based Sexual Abuse: A Study on the Causes and Consequences of Non-Consensual Nude or Sexual Imagery* (Routledge, 2021), 1–2. The European Institute for Gender Equality defines Non-Consensual Intimate Image (NCII) abuse as the distribution or threat of distribution of “intimate, private and/or manipulated images/videos... without the consent of the subject,” and notes that NCII often coexists with intimate partner violence. In such cases, “revenge porn” is common, and involves an effort to “publicly shame and humiliate the victim.” See: European Institute for Gender Equality, “Cyber Violence against Women and Girls: Key Terms and Concepts,” 2022.

2 Social norms are the unwritten rules that guide human behavior and define acceptable and appropriate actions within a community. These norms are based on what people do, what they think others do, and what they believe others approve of and expect them to do. Social norms thus result from the interplay between behavior, beliefs, and expectations, and are learned and integrated from a very early age, often during infancy. They are enforced through social sanctions (punishments) for non-adherence, and social benefits (rewards) for adherence. When people conform to social norms, they expect to be rewarded; and when they violate norms, they expect to be punished. Social norms exist when people behave in certain ways either because they believe other people like them practice a behavior (descriptive norms) or because they believe those who matter to them approve of a behavior (injunctive norm). See: UNICEF, “Defining Social Norms and Related Concepts,” November 2021.

3 These may include symptoms of depressive or anxiety disorder, or of post-traumatic stress disorder. See: Vasileia Karasava, “Personality, Attitudinal, and Demographic Predictors of Non-consensual Dissemination of Intimate Images,” *Journal of Interpersonal Violence* 37, no. 22-23 (2021): NP19265–NP19289.

4 Article 22 of Kosovo's Constitution stipulates that the Istanbul Convention is directly applicable in the country.

5 Council of Europe Convention on preventing and combating violence against women and domestic violence, CETS 210, 11 May 2005, Article 12(1) and (5). Available at: <https://rm.coe.int/t168008482e>.

6 Ibid., Article 15.

An analysis of the legal framework in Kosovo

It must be underlined that NCII abuse is a criminal act, as well as a violation of the right to privacy.⁷ In Kosovo, the right to privacy is guaranteed by Article 36 of the Constitution, which stipulates that “everyone enjoys the right to have her/his private and family life respected, the inviolability of residence, and the confidentiality of correspondence, telecommunication and other communication,” and that “every person enjoys the right of protection of personal data, which should be regulated by law”⁸ However, the Law on Protection of Personal Data does not contain specific provisions that relate to NCII.⁹

It is problematic that criminal acts related to NCII are not explicitly regulated by Kosovo’s Criminal Code, as this affects how or whether these acts are reported, investigated, and adjudicated. Article 202 of the Code addresses the issue of NCII abuse in general terms, referring to unauthorized photographing and recording, and unauthorized distribution of images. The main deficiency of this Article is that it does not stipulate how “authorization” (i.e., consent) should be obtained, declined, or terminated. Paragraph 1 of the Article reads that, “whoever, without authorization, photographs, films, or videos or in any other way records another person in his or her personal premises or in any other place where a person has a reasonable expectation of privacy, and in that way fundamentally violates another’s privacy, shall be punished by a fine or by imprisonment of one (1) to three (3) years” And paragraph 2 applies the same test to distribution, stating that “whoever, without authorization, passes on, displays or grants access to a third person to a photograph, film, videotape or any other recording obtained in violation of paragraph 1... shall be punished by imprisonment of one (1) to three (3) years”.¹⁰

Moreover, perpetrators must personally take or record the intimate images in question to be charged under Article 202, as it does not apply in cases where these images are obtained through other means or a third party. Depending on how NCII are acquired by a perpetrator, Article 199 may be relevant, as it specifies sanctions (a fine, or imprisonment up to a year) if data is obtained by interference or intrusion into another person’s computer systems. But the scope of Article 199 is limited to criminal intrusion and interference in computer systems only, and does not pertain to smartphones and other communication technologies.

In cases where threats have been made to distribute or publish NCII, the legal basis for intervention is even more limited in Kosovo. Because no provisions of the Criminal Code apply specifically to cases involving NCII, perpetrators who threaten to release or distribute NCII face punishment of a fine or up to six (6) months imprisonment. These sanctions do not appear to have disincentivized perpetrators. However, in cases charged as blackmail – when a perpetrator intends to gain material benefit from distributing NCII – the Code does include provisions that implicitly address the harm of NCII abuse by referencing damages to honour and reputation. Acts of blackmail are regulated

⁷ Meghan Sali, “Intimate Images and Authors’ Rights: Non- Consensual Disclosure and the Copyright Disconnect,” *Canadian Journal of Law and Technology* 19, no. 2 (2021): 333–369.

⁸ Constitution of the Republic of Kosovo, 15 June 2008, Article 36.

⁹ Law on Protection of Personal Data, Official Gazette of the Republic of Kosovo, No. 06/L-082, 25 February 2019.

¹⁰ Criminal Code of the Republic of Kosovo, Official Gazette of the Republic of Kosovo, No. 06/L-074, 14 January 2019, Article 202.

by Article 329 of the Code, which stipulates punishment of a fine and imprisonment of six (6) months to five (5) years.¹¹ It should be noted that the issue of NCII abuse is not addressed directly by EU legislation either. While the General Data Protection Regulation (GDPR) sets out strict rules for the processing of personal data, including the protection of sensitive personal data, it does not define forms of cyber violence; though, it provides protection to victims of cyber violence and provides that sanctions may be imposed against individuals responsible for sharing non-consensual content and against those who publish such content.¹² Hence, several EU member states have adopted laws that criminalize NCII abuse

The most significant example of this is Ireland, which adopted the Harassment, Harmful Communications and Related Offences Act in December 2020, defining an intimate image as any visual representation, made by any film or digital means, which shows or purports to show: a person's genitals, buttocks, or anal region and, in the case of a woman, her breasts; the underwear covering the person's genitals, buttocks, or anal region and, in the case of a woman, her breasts; a person who is nude; or a person engaged in sexual activity.¹³ The Act criminalizes the recording, distribution, publishing, or threat to distribute or publish intimate images without the consent of the subject, and sanctions this offense with a penalty up to seven (7) years imprisonment and/ or an unlimited fine. Importantly, this law applies regardless of whether the photos or recordings in question were taken personally by the perpetrator, were sent by the victim, or were obtained through other means; it is the distribution or threat to distribute NCII that is punishable. It also takes into consideration the psychological harm to the victim, which marks an enormous step forward in law in this area. Ireland's Harassment, Harmful Communications and Related Offences Act could thus serve as a valuable model for other countries seeking to ensure adequate protection for victims and adequate punishment for perpetrators in cases of NCII abuse.

An analysis of judicial practice in Kosovo

The first verdict in a case involving NCII was issued by a Kosovo Court in 2016. Here, the 55 verdicts that have been delivered in these cases since then, through the last verdict published in 2022, are analysed to determine how the law is applied in practice to NCII abuse in Kosovo.¹⁴ According to the Kosovo Police and Kosovo Judicial Council, these cases are adjudicated under Article 202 of the Criminal Code.¹⁵ As noted above, this Article criminalizes unauthorized photographing and recording, as well as unauthorized distribution.

Information provided by the Kosovo Police indicates that, in 2022 alone, 45 cases of NCII distribution were reported and submitted to the respective Basic Courts of Kosovo, based on charges drawn from Article 202.¹⁶ Meanwhile, the Kosovo Judicial Council recorded 32 cases of violations of Article 202 in 2022, 24 of which were resolved. Yet, the online database of the

¹¹ Ibid, Article 329.

¹² European Institute for Gender Equality, *Combating Cyber Violence against Women and Girls* (Vilnius, 2022), 20.

¹³ Government of Ireland, Harassment, Harmful Communications and Related Offences Act 2020, Irish Status Book No. 32 of 2020, 28 December 2020.

¹⁴ Case information was extracted from the database of the Kosovo Judicial Council. See Annex 1 for a list of the cases analysed for this research.

¹⁵ Kosovo Police, e-mail communication with authors, 31 January 2023; and Kosovo Judicial Council, e-mail communication with authors, 2 February 2023.

¹⁶ Kosovo Police, e-mail communication with authors, 31 January 2023.

Council shows that only 3 of 14 verdicts issued in 2022 were in cases involving NCII distribution, as other verdicts in which Article 202 was applied did not involve NCII.¹⁷ Furthermore, research for this study revealed that NCII cases are not always addressed under Article 202, but also through other provisions of the Criminal Code. Therefore, the verdicts analysed here are categorized into two groups: distribution of NCII (28 cases), and possession of NCII used for other criminal purposes (27 cases). In addition, this section will address the Issue of compensation of emotional and psychological, and other damages.

Distribution of non-consensual intimate images

The Kosovo Judicial Council lists 28 verdicts in cases involving the distribution of NCII (see Table.1). Courts in Prishtina and Peja had the highest number of these cases (6 each), followed by Prizren (5), Ferizaj and Gjakova (4 each), and Gjilan (3). Other courts, at the basic or appeals levels, have not issued any verdicts relating to the distribution of NCII.

Table 1. Verdicts in cases involving the distribution of NCII, per year

Year	Number of verdicts
2018	1
2019	11
2020	5
2021	5
2022	6
TOTAL	28

The earliest verdict in a case adjudicating the distribution of NCII in Kosovo was issued in 2018, and 2019 marked the year with the highest number of these verdicts (11). In the 28 such cases tried in Kosovo through 2022, there have been 29 victims and 29 perpetrators, divided along clear gender lines. In other words, nearly all (28) victims have been female, including three minor girls, and almost all (28) perpetrators have been male, whereas the single male plaintiff was victimized by a woman perpetrator.

It is clear that women are by far the most likely victims of crimes involving the distribution of NCII.¹⁸ But this analysis also found, in all but two cases, that the perpetrators had some kind of previous or current relationship with their victims – whether prior intimate relationships(12), previous marriages (6), current marriages(3) previous engagement (2) ; or a history of dating (1) or living in the same neighbourhood (1). The declared motives of perpetrators varied, with some hoping to reunite with the victim, some seeking material gain, some aiming to harass and intimidate, and some intending to harm the victim's reputation and honour. In a number of instances, the distribution of NCII was prompted by a disagreement between the victim and perpetrator.¹⁹ While paragraph 2 of Article 202 of Kosovo's Criminal Code provides a legal basis for addressing

¹⁷ Kosovo Judicial Council, e-mail communication with authors, 2 February 2023.

¹⁸ *ibid.*

¹⁹ *Ibid.*

cases of NCII distribution, these cases are sometimes adjudicated under paragraph 1 of the same article – which addresses the act of taking intimate images but not their distribution – or more often, under other articles of the Code altogether. The application of other articles suggests that some victims have not received fair treatment by the courts or full justice under the law, and that the legal burden on some perpetrators has been reduced. These charges have included: infringing privacy in correspondence and computer databases (6 cases), harassment (6 cases), unauthorized photographing and recording (5 cases), intrusion into computer systems (3 cases), domestic violence (3 cases), blackmail (2 cases), and sexual harassment (1 case).

Table 2. Number of cases of distribution of NCII charged under different articles of the Criminal Code

Distribution of NCII adjudicated under Article 202, paragraph 2	Distribution of NCII adjudicated under Article 202, paragraph 1	Distribution of NCII adjudicated under other articles of the Criminal Code and Laws
9²⁰	2²¹	17²²
	Although Article 202 was used to judge these cases, instead of using paragraph 2, they were judged based on paragraph 1, which only highlights taking intimate images and not sharing them. In these 2 cases, the images were shared.	<ul style="list-style-type: none"> - Infringing privacy in correspondence and computer databases (6 cases) - Unauthorized photographing and other recording (5 cases) - Harassment (6 cases) - Intrusion into computer systems (3 cases) - Domestic violence (3 cases) - Blackmail (2 cases) - Sexual Harassment (1 case) - Coercion (1 case) - Attempted blackmail (1 case) - Law on Protection Against Domestic Violence (03/L-182)(1 case)

The sanctions imposed on the perpetrators in these 28 cases fall into four categories: fines, imprisonment, aggregated sentences, and imprisonment replaced by a fine (see Table 3). Yet, this research found that only 3 of 9 sentences of imprisonment resulted in effective imprisonment, as the others were conditional sentences, which are executed if the perpetrator does commit another criminal offence within a certain period of time. Similarly, only 2 of 9 aggregated sentences were effective; in 3 others, both imprisonment and a fine were conditional, and in 4 others, imprisonment was conditional but the fine was not.

²⁰ Case Numbers: 2018:067787, 2018:071422, 2018:063271, P.nr.173/18, 2019:166531, 2019:209803, 2019:084937, 2020:045537, and 2022:003671.

²¹ Case Numbers: 2018:067797 and 2022:088189.

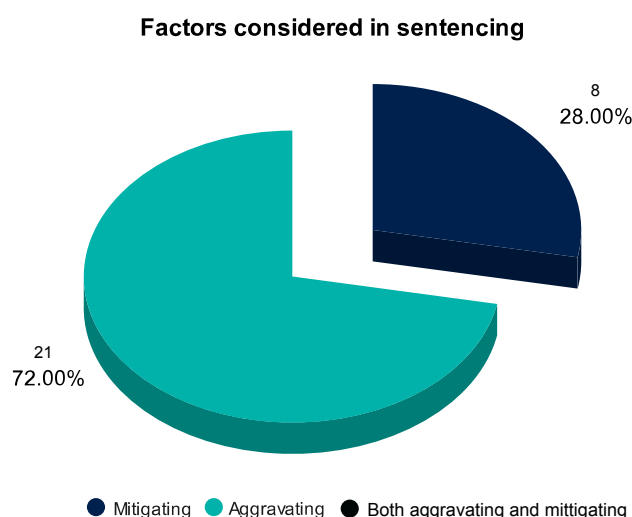
²² Case Numbers: 2018:048285, 2018:046896, 2018:067386, 2019:155438, 2019:235747, 2019:116871, 2019:299173, 2019:240487, 2019:291634, 2019:293530, 2019:221265, 2020:097709, 2020:108437, 2021:092275, P.nr. 981/2021, 2021:169715, and 2022:136649.

Table 3. Sanctions in cases of distribution of NCII, by number of cases

Fine	Imprisonment	Aggregated	Imprisonment replaced by fine
7²³	9²⁴	9²⁵	3²⁶

In 25 of the 28 cases adjudicated for the distribution of NCII, sentencing decisions involved the consideration of mitigating and/or aggravating factors, based on relevant provisions in Kosovo's Criminal Code.²⁷ Both mitigating and aggravating factors were identified in 21 cases, while only mitigating factors were identified in 4 cases. But there were no cases in which only aggravating factors were identified.

Figure 1. Number of cases of distribution of NCII in which aggravating and mitigating factors were considered by the court during sentencing



These findings reveal a high degree of “legal sympathy” among judges for perpetrators of criminal acts involving the distribution of NCII. Indeed, Article 202 allows for sentencing of one (1) to three (3) years imprisonment for the unauthorized distribution of NCII, yet as Table 4 shows, the range of sentencing imposed in these cases in Kosovo has clearly leaned toward leniency. This does not serve the preventive purpose of discouraging future perpetrators, and may encourage the commission of these crimes if the perceived cost of committing them is not greater than their perceived benefit to the perpetrator.

²³ Case Numbers: P.nr.173/18, 2018:046896, 2019:221265, 2019:293530, 2019:084937, P.nr.981/2021, and 2022:088189.

²⁴ Case Numbers: 2018:071422, 2018:063271, 2019:235747, 2019:291634, 2019:209803, 2020:097709, 2020:045537, 2022:136649, and 2022:003671.

²⁵ Case Numbers: 2018:067797, 2018:067386, 2018:048285, 2019:240487, 2019:155438, 2019:116871, 2019:166531, 2019:299173, and 2021:169715.

²⁶ Case Numbers: 2018:067787, 2020:108437, and 2021:092275.

²⁷ The most common mitigating factors cited in these verdicts were: good behaviour, lack of a criminal record, a guilty plea, the promise not to commit another crime, and remorse; the most common aggravating factors were: the degree of criminal liability, the extent of danger posed, the intensity of intent, specific motives, and the damage caused to the victim (i.e., causing fear, pain, torment, emotional distress, or damage to personal and moral integrity).

Table 4. Sentencing ranges in cases of distribution of NCII

	Fine ²⁸	Imprisonment ²⁹	Aggregated ³⁰	Imprisonment replaced by fine
Lowest	200€	6 months	3 months and 200€	30 days = 400€
Highest	1200€	1.5 years	1 year and 1200€	6 months = 2000€

Possession of non-consensual intimate images for other criminal purposes

In cases charged as possession of NCII for other criminal purposes, a perpetrator uses NCII to commit a criminal offence such as blackmail, coercion, or harassment against the subject depicted in the images. These cases are adjudicated under provisions of the Criminal Code that apply to these other criminal acts, as they do not fall under the scope of Article 202 of the Code – which only addresses the unauthorized photographing and recording of images without distinguishing between intimate and other types of images, and does not clarify the requirements for obtaining consent to record or possess photographs and recordings that include intimate images. There have been 27 cases in Kosovo that fall into this category, based on an analysis of verdicts published by the Kosovo Judicial Council. Prishtina has seen the highest number of these cases (8), followed by Prizren (6 cases), and then by Peja, Ferizaj, and Gjakova (3 each). The fewest number of these cases have been heard in Gjilan and Mitrovica (2 each).

Table 5. Verdicts in cases involving possession of NCII for other criminal purposes, per year

Year	Number of verdicts
2016	1
2017	2
2018	0
2019	4
2020	6
2021	8
2022	6
Total	27

This research again, the majority of these victims were female (21), including a minor girl; but in this category, six of the victims were men. Still, nearly all the perpetrators were also men (26), with only two women accused of perpetrating these crimes. In 12 cases, the victims and perpetrators had some sort of relationship. In 8 cases, they had a past relationship; and in 4 cases, they were in a relationship at the time the crime was committed – including 2 in which the victim and perpetrator were married, and one case each in which the victim and perpetrator were dating or

²⁸ Cases: 2019:084937 and 2018:046896

²⁹ Cases: 2019:235747 and 2020:045537

³⁰ Cases: 2018:067797 and 2019:299173

in an intimate relationship.

The declared motive of many of these perpetrators (21) was material gain. However, some hoped to reunite with a victim with whom they had a previous relationship (2), wanted to start dating the victim (2), aimed to continue dating the victim (1), sought to maintain an emotional hold on the victim (1), or intended to force the victim to perform sexual acts (1). In these 27 cases, the courts imposed 28 sentences on the 28 perpetrators, in the form of fines, imprisonment, aggregated imprisonment, and imprisonment replaced by a fine. Only 1 of 5 sentences of imprisonment for these crimes was effectively carried out, though, as the other 4 were conditional.

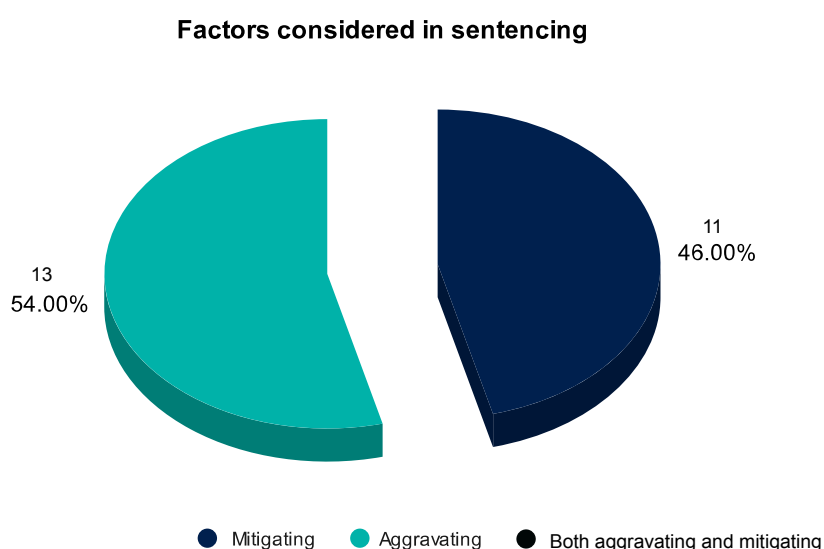
Moreover, only 2 of the 15 aggregated sentences were effectively implemented, with both imprisonment and fines conditional in 9 cases, and imprisonment (but not fines) conditional in the remaining 5 cases.

Table 6. Sanctions in cases of possession of NCII for other criminal purposes, by number of cases

Fine	Imprisonment	Aggregated	Imprisonment replaced by fine
3³¹	5³²	15³³	4³⁴

In 24 of these 27 cases, mitigating and/or aggravating factors were considered in the sentencing phase. Both mitigating and aggravating factors were identified in 13 cases, while only mitigating factors were identified in 11 cases. There was no case related to the possession of NCII in which aggravating factors were identified.

Figure 2. Number of cases of possession of NCII for other criminal purposes in which aggravating and mitigating factors were considered by the court during sentencing



31 Case Numbers: P.nr.2975/14, P.nr.4660/17, and 2019:234703.

32 Case Numbers: 2019:195344, 2019:151671, 2019:219793, 2019:130615, and 2020:139384.

33 Case Numbers: 2018:055113, 2019:261332, 2021:256096, and 2022:051257.

34 Case Numbers: 2018:055113, 2019:261332, 2021:256096, and 2022:051257.

These findings echo those presented in the previous section on NCII distribution, and confirm that judges in Kosovo have again exhibited a notable “legal sympathy” towards perpetrators of NCII abuse. The range of sentencing in cases of NCII possession for other criminal purposes is depicted in Table 7, and exemplifies this point. Such leniency towards perpetrators fails to serve as a deterrent for future perpetrators and may, in fact, encourage the commission of these criminal acts.

Table 7. Sentencing ranges in cases of possession of NCII for other criminal purposes

	Fine ³⁵	Imprisonment ³⁶	Aggregated ³⁷	Imprisonment replaced by fine ³⁸
Lowest	200€	6 months	3 months and 200€	30 days = 400€
Highest	1200€	1.5 years	1 year and 1200€	6 months = 2000€

Compensation to victims for emotional, psychological, and other damages

One of the biggest deficiencies in Kosovo when it comes to the judicial treatment of NCII abuse is the issue of financial compensation for victims, for the emotional and psychological damage caused by the offence as well as for any potential loss of income the victim may have experienced or will experience as a result of the offence and related court proceedings. The purpose of sentencing is in fact to provide compensation to victims or the community for losses or damages caused by criminal conduct, as stated in Article 38 of the Criminal Code. And Article 59 of the Code allows for the imposition of accessory sentences that require perpetrators to pay this compensation. However, an examination of verdicts issued in cases involving NCII reveals that almost every victim has been directed to pursue potential damage claims through civil litigation. This is an inadequate form of justice for victims, given that the civil procedural process can be extremely lengthy, dragging on for so many years that some civil cases in Kosovo have not reached a final judgment even after two decades.³⁹

Further, while the World Justice Project’s (WJP) Rule of Law Index indicates that Kosovo has made significant progress in strengthening rule of law institutions, with an overall ranking of 57 out of 140 countries and jurisdictions worldwide – which surpasses all neighbouring states – Kosovo’s ranking in the area of civil justice is much lower, at 84.⁴⁰ Specifically, it is a high rate of unreasonable delays that pushes Kosovo down the scale; as the country ranks 128 out of 140 countries and jurisdictions on this particular metric.⁴¹ This can leave victims who are forced to turn

³⁵ Cases: 2019:084937 and 2018:046896

³⁶ Cases: 2019:235747 and 2020:045537

³⁷ Cases: 2018:067797 and 2019:299173

³⁸ Cases: P.nr.1223/16 and 2020:032012.

³⁹ Driton Nocaj, *Drejtësia Civile në Kosovë: Ligji vs Praktika* (Prishtina: IKD, 2019), 4–5.

⁴⁰ World Justice Project, *WJP Rule of Law Index 2022* (Washington, D.C., 2022), 108. An interactive WJP Rule of Law Index for 2022 can be accessed online at: <https://worldjusticeproject.org/rule-of-law-index/global>.

⁴¹ See the scores for each sub-factor weighed by the WJP in determining the civil justice ranking, at: <https://worldjusticeproject.org/rule-of-law-index/factors/2022/Kosovo/Civil%20Justice>

to the civil system for appropriate compensation feeling hopeless.

How social norms and psychological effects impact victims of NCII abuse

In Kosovo, where closely interconnected family structures and a focus on collective responsibility and honour are norms, family and community hold considerable sway. These norms create social pressure to conform to certain standards and can make it a challenge to break with tradition or speak out against harmful community practices, and also tend to position women as the “face of honor.” As sociology professor Linda Gusia explained to researchers, in Kosovo’s social context, this means that cases involving NCII are often perceived as a failure of women to preserve their own integrity; which makes it very difficult for victims to ask for help or even articulate what has happened to them. And worse, the norms internalized by these victims make them feel a sense of guilt and responsibility for the crimes perpetrated against them. Gusia notes that, in Kosovo, there is “a tendency to blame the victim.”⁴²

There are certain communities within Kosovo where the stronger influence of conservative or fundamentalist interpretations of religion has manifested in even more stringent social norms for women. According to Professor Gusia, these religious practices often translate patriarchal norms to extremes, designating very specific roles to women and men, and instrumentalizing notions of stigma and shame. In such contexts, it may be even more difficult for victims of NCII abuse to come forward and seek justice than women in other parts of Kosovo, as they may have a reasonable fear of facing considerable social stigma, ostracism, or even violence for speaking out. Victims may also face pressure from their families or communities to keep quiet, or to resolve the matter privately, instead of seeking help from rule of law institutions.

On the topic of consent, Professor Gusia contends that citizens in Kosovo are informed only to a certain extent about the concept, and have not internalized its meaning; whether in the field of research, in art and culture, or in the private sphere. She emphasizes that NCII abuse, the victims of which are overwhelmingly women, frequently serves to victimize women in Kosovo twice: once when the perpetrator commits the offence, and again when women face the significant stigma attached to reporting that offence. In her view, many of the judicial processes carried out in recent years in an effort to address severe forms of gender-based violence have ended in total failure by re-victimizing and re-traumatizing victims. This is because legal systems are simply made up of people who adhere to the value systems to which they have been socialized.

Activist Arbër Nuhiu also underscored that the concept of consent in the context of the publication of private information or personal data is not well-understood in Kosovar society, so that many victims are unaware that the unauthorized publication of their data or information is a criminal act.⁴³ At the same time, psychology professor Linda Hoxha notes, social norms often have the

⁴² Dr. Linda Gusia, Professor of Sociology, University of Prishtina, interview by authors, 31 January 2023.

⁴³ Arbër Nuhiu, Activist and advocate for the LGBTQ+ community, Prishtina, interview by authors, 6 February 2023.

power to normalize behaviours that violate personal space, and consequently individual rights making it even more unlikely that victims report these violations.⁴⁴ A similar point was made by Besarta Breznica of the Women's Network of Kosovo, who claims that the patriarchal nature of Kosovar society is such that the notion of consent is entirely neglected in many of these cases. She alleges that the reason a perpetrator engages in NCII abuse is never contemplated in Kosovo, as the focus is always on why the victim sent the photo in question, or allowed themselves to be recorded or photographed; and while this responsibility of victims is a regular topic of discussion, the sharing of NCII is not widely perceived as criminal.⁴⁵

In these social conditions, many individuals who have been subjected to NCII abuse have trouble moving forward. Theirs becomes an experience, like quite a few in Kosovo, that remains taboo and is not discussed. This does not protect victims from being judged and stereotyped, however, and sometimes rather harshly, and they often find it hard to access the support they need, even from relevant institutions. Hence, many victims lack sufficient confidence to report their case, much less endure the investigative and judicial processes. Furthermore, as Breznica explains, many police officers, attorneys, social work centre officials, prosecutors, and judges operate from a patriarchal mindset that impacts their implementation of the law and leads justice and police institutions in Kosovo to protect male abusers. Nuhiu, who is part of the LGBTQ+ community in Kosovo, agrees that culture and tradition play a significant role in the underreporting of cases in which the privacy of girls and women is violated, as it is these women who are framed as “shameful” while male perpetrators are not. Indeed, Kosovo remains a society in which it is still largely seen as appropriate for a woman to confront a man.⁴⁶

Considering this, Edi Gusia, head of the Agency for Gender Equality, has worked to draw attention to the ways in which social norms can affect both rule of law institutions and victims of crimes involving NCII. She stressed to researchers that certain problematic cultural norms continue to prevail in the institutions tasked with handling these cases, which means that some of the people mandated to offer help to victims of violence take a deeply misogynistic approach to doing so. For example, Gusia recounted cases in which officials have applied their own concept of the law, such as by justifying the violation of a woman's rights by her male partner because they were in a long-term relationship. When institutions lack the capacity or gender competence to respond adequately to victims, and cultural norms act as a barrier to women seeking access to justice and support services, some victims will inevitably face secondary victimization. On top of this, delays in the judicial process inflict further harm.⁴⁷

The opinions and data provided to researchers by these experts in interviews were confirmed by the personal experiences of two victims of NCII crimes, each of whom chose not to report this abuse to authorities but were willing to be interviewed for this study. One victim shared that she

⁴⁴ Dr. Linda Hoxha, Professor of Psychology, University of Prishtina, interview by authors, 6 February 2023.

⁴⁵ Besarta Breznica, Kosovo Women's Network, Prishtina, interview by authors, 26 January 2023.

⁴⁶ Nuhiu, interview by authors.

⁴⁷ Edi Gusia, Chief Executive, Agency for Gender Equality, Prishtina, interview by authors, 31 January 2023.

had been forced to take two months off from school due to the social difficulties she faced, but was too afraid to tell her parents what she was going through. During this time, she was harassed by male classmates who made sexually explicit comments about her body, and when she and a friend tried to confront the individuals responsible for distributing images of the victim, they responded dismissively and behaved inappropriately. As a result, the victim began worrying about her own safety and developed mental health issues. Though she considered reporting the incident to authorities, she ultimately decided against it, due to the prevalence of a patriarchal mentality in the community and her lack of trust in law enforcement institutions. She was aware that other women had reported similar violations and had not received fair treatment, which undermined her confidence in the system.⁵⁴

Another victim of NCII abuse described feeling distressed, exposed, and out of control of her personal image and reputation after a group of young women spread an image of her around their school without her consent. This victim's biggest fear was that the image might reach her parents, family members, or professors and negatively impact her future. The experience has had a continued effect on her mental health over time, manifesting in symptoms of PTSD and issues of trust even when she is asked to appear in non-intimate photographs. Although she has received love and support from people close to her, this victim also chose not to report the incident to authorities due to prevailing social norms. Looking back, she regrets not having taken action and wishes she had overcome the lack of courage she felt in order to present her case to officials.⁴⁸

Edi Gusia contends that the emotional consequences of this kind of psychological violence have received far too little attention in Kosovo. This makes it more difficult to document, and also means the country does not have the human capacity necessary to investigate these crimes and provide an adequate institutional response. There are few clinical psychologists in Kosovo with the competence to support victims of this type of abuse.⁴⁹ Yet, Professor Hoxha believes that the consequences for victims who have had personal photos, videos, or other information distributed without their consent can be serious and far-reaching. And the prejudice, judgment, and stereotype that can emerge in the context of cases of NCII abuse can worsen the impact on victims, and even lead to fatal outcomes.⁵⁰

In this sense, the social context experienced by victims is crucial, as it can increase or decrease their susceptibility to mental health complications. A strong social support system thus plays an important protective role in these cases. While Hoxha notes that the responses and experiences of every victim are unique, scientific evidence indicates rather clearly that threats such as those often associated with NCII abuse can contribute to various mental health outcomes, including trust issues, anxiety, depression, and in some cases, suicidal ideation. If crimes involving NCII are also connected to a traumatic event, they can serve as a trigger for post-traumatic stress disorder as well. To address deficiencies in Kosovar institutions and systems, Edi Gusia proposes that a more

48 From an interview with the victim, 1 February 2023.

49 From an interview with the victim, 2 December 2022.

50 Edi Gusia, interview by authors.

holistic approach must be taken to capacity building, including through consistent and continuous training for police officers, legal professionals, and members of the judiciary. She believes there is also a need to train educators at all levels, as they are in the best position to inform and engage with students – both boys and girls – from an early age, to help them understand various forms of violence and abuse. Of course, this abuse does not discriminate by age, and many adult women are ill-prepared to protect themselves or respond if they are victimized. According to Gusia, it is therefore important to clarify that this type of abuse is a form of gendered violence.

That said, there are very few resources or educational programmes currently available to professionals in Kosovo who seek the training required to offer appropriate support to victims of NCII abuse or other forms of gendered violence, which will be a necessity if victims are to receive more adequate and more dignified justice. Professor Linda Gusia suggests that the only way to intervene in the sexist and patriarchal values systems to which most prosecutors, judges, and police officers are socialized in Kosovo is to impose strict protocols that must be adhered to across all rule of law institutions. She argues that these protocols ought to be drafted through a process that deeply considers the social context and incorporates the feedback of experts and other key stakeholders. Furthermore, she believes the sanctions for crimes involving NCII should be tougher, considering the destructive impact these offences can have on victims.⁵¹

Conclusions and recommendations

As this analysis has shown, the Criminal Code of Kosovo lacks provisions that explicitly criminalize abuses related to NCII, which hinders the reporting, investigation, and prosecution of these offences. While Article 202 of the Code addresses the unauthorized photographing, recording, and distribution of images in general terms, it does not stipulate what it means to obtain, refuse, or terminate authorization (i.e., consent). As a result, only about one-third of cases involving the distribution of NCII in Kosovo have been charged under Article 202, and in others, a lesser charge has been applied. Another significant deficiency in Kosovo's Criminal Code is that it does not govern the unauthorized possession of personal images, including intimate ones. In the 27 cases of unauthorized possession of NCII that have been tried in Kosovo, intimate images were used for criminal purposes including blackmail, coercion, or harassment; crimes that fall outside the scope of paragraph 1 of Article 202.

The findings of this research also highlight the considerable leniency displayed by judges in Kosovo towards perpetrators of NCII abuse, the vast majority of whom are men. Indeed, in many cases, mitigating factors have been generously applied to reduce sentences or replace them with fines. At the same time, it is an uphill battle for victims to secure adequate compensation for the emotional, psychological, and other damages they have suffered as a result of these crimes. Although the Criminal Code provides that compensation be paid to victims and that an accessory sentence can require a convicted perpetrator to pay this compensation, victims are typically directed by authorities to pursue potential damage claims through civil litigation – a process that

⁵¹ Linda Gusia, interview by authors.

can be an extremely lengthy, lasting years or even decades.

This research was strengthened by the perspectives of various experts, all of whom discussed the role that Kosovo's patriarchal social norms play in the context of NCII abuse. These norms offer perpetrators a sense of impunity or entitlement and have profound effects on the experience of victims, who frequently feel a sense of guilt or shame for having "allowed themselves" to be victimized. These feelings are only magnified by the treatment victims often receive from officials in rule of law institutions, who have also internalized these prevailing norms. Despite this leniency for perpetrators, as this study demonstrates, the unauthorized distribution and possession of NCII can have severe costs for victims, ranging from social consequences such as stigma and stereotyping, to mental health consequences such as anxiety, depression, and in some cases, contemplations of suicide.

Based on the findings of this research and provisions of the Istanbul Convention, relevant stakeholders in Kosovo should thus consider implementing the following measures:

- Adopt a criminal offence specific to non-consensual intimate images (NCII): The Criminal Code of Kosovo should be amended to criminalize various acts involving NCII and to facilitate the reporting, investigation, and prosecution of these crimes.
- Launch education and awareness-raising campaigns: Public awareness campaigns should be organized to educate the public, especially young people, about the dangers of NCII and the harm NCII abuse causes to victims, and should simultaneously aim to combat patriarchal norms and the objectification of women and girls.
- Ensure that legal procedures and decisions in cases involving NCII adhere to provisions of the Criminal Code and the Istanbul Convention: The courts must treat crimes related to NCII seriously and must hold perpetrators fully accountable for their actions, and should therefore refrain from applying mitigating factors to lower sentences or replace them with fines – which sends a message to perpetrators that these crimes are not considered serious – and instead impose harsher penalties to deter individuals from committing these crimes in the future.
- Train law enforcement and judicial officials: Law enforcement and judicial professionals should be provided with specialized training to help them identify and handle cases involving NCII, with a focus on the legal and ethical considerations involved in investigating and prosecuting these cases, as well as best practices for providing appropriate support to victims.
- Train judges: It is crucial that awareness is raised among judges about the issue of NCII abuse and its impact on victims, to sensitize the judiciary to the fact that these victims can be re-victimized by the leniency demonstrated to perpetrators.
- Establish victim support services: All victims of NCII abuse should have access to victim support services that provide emotional and psychological resources and help victims access legal aid.
- Strengthen legal provisions related to victim compensation: The Criminal Code of Kosovo should be strengthened to better provide for compensation to victims of crimes involving NCII, including through measures that ensure victims are compensated for both material and non-material damages.

Appendix - Verdicts in cases involving NCII found in the database of the Kosovo Judicial Council

Distribution of NCII

Case Numbers	Verdict Date
2018:048285	19.11.2018
2018:071422	01.10.2019
P.nr.173/18	15.02.2019
2018:046896	21.02.2019
2018:067386	07.02.2019
2018:067797	16.09.2019
2018:067787	24.09.2019
2019:209803	13.11.2019
2019:155438	18.11.2019
2019:235747	28.11.2019
2019:116871	24.12.2019
2019:299173	04.02.2020
2019:084937	21.04.2020
2019:240487	06.03.2020
2020:097709	09.09.2020
2019:291634	11.01.2020
2020:045537	01.03.2021
2020:108437	04.08.2021
2021:092275	18.06.2021
2019:293530	07.07.2021
P.nr. 981/2021	15.12.2021
2022:136649	03.08.2022
2022:003671	23.03.2022
2022:088189	23.05.2022
2021:169715	25.05.2022
2019:166531	08.04.2022
2019:221265	11.02.2022
2018:063271	19.09.2019

Possession of NCII

Case Numbers	Verdict Date
2020:136745	06.04.2022
2019:095468	26.11.2020
2021:288879	15.07.2022
2022:051257	29.04.2022
2019:195344	16.03.2020
P.nr. 64/18	20.05.2019
P.nr. 1223/16	18.10.2016
2018:048989	25.06.2019
P.nr. 37/20	09.03.2020
2019:261332	10.07.2020
2018:018829	01.07.2019
2020:139384	23.03.2021
P.nr. 2975/14	07.09.2017
P.nr. 4660/17	20.12.2017
P.nr. 106/17	22.10.2021
2019:151671	17.08.2021
2019:234703	24.02.2020
2020:171691	26.01.2022
2019:219793	06.11.2020
2020:032012	10.11.2021
NR 2546/20	22.04.2021
2018:055113	26.02.2021
2019:130615	14.12.2021
2019:190168	25.10.2019
2021:129119	28.06.2022
2021:256097	13.12.2021
2021:051987	24.05.2022

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