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Institucioni i Avokatit të Popullit • Institucija Ombudsmana • Ombudsperson Institution

Ex officio
Case No. 551/2017

RECOMMENDATION REPORT
OF
THE OMBUDSPERSON OF THE REPUBLIC OF KOSOVO

With regards to

Revocation of certain competencies of Kosovo Property Comparison and Verification Agency according to Law No. 05/L-010 on Kosovo Property Comparison and Verification Agency

**To: Mr Ramush Haradinaj, Prime Minister
Government of the Republic of Kosovo**

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Assembly of the Republic of Kosovo**

**Mrs Albulena Haxhiu, Chairperson
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Republic of Kosovo**

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Prishtina, 19 October 2017

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OBJECTIVES OF THE REPORT

1. Law No. 05/L-010 on Kosovo Property Comparison and Verification Agency (hereinafter: "Law on KPCVA") foresees the revoking of two important competencies of this Agency (hereinafter: "Agency" or "KPCVA"). Initially, the Law stipulates that 18 months from the entry into force of the Law, the Agency will no longer continue to administer the properties. Secondly, in any cases where KPCVA carries out two evictions of occupants of the same property, the Law on KPCVA stipulates that the responsibility for any other eviction related to that property will be transferred to the owner himself/herself, within the regular private enforcement system.
2. This Report has two main purposes:
 - (1) Assess whether the revocation of such two competencies of KPCVA is a violation of owners' rights under the Constitution and European and international human rights standards; and
 - (2) Provide concrete and specific recommendations to competent authorities on steps to be taken to fully respect the human rights.

CONSTITUTIONAL AND LEGAL BASIS

3. According to Article 135, paragraph 3 of the Constitution, "The Ombudsperson is eligible to make recommendations and propose actions when violations of human rights and freedoms by the public administration and other state authorities are observed".
4. According to the Law No. 05/L-019 on Ombudsperson, Article 16, paragraph 4, "The Ombudsperson has the power to investigate . . . on its own initiative (ex officio), if from findings, testimonies and evidence presented by submission or by knowledge gained in any other way, there is a base resulting that the authorities have violated human rights and freedoms stipulated by the Constitution, laws and other acts, as well as international instruments on human rights".
5. Also, Law No. 05/L-019 on Ombudsperson, Article 18, paragraph 1 stipulates that the Ombudsperson, among other things, has the following responsibilities:
 - "to draw attention to cases when the institutions violate human rights and to make recommendation to stop such cases and when necessary to express his/her opinion on attitudes and reactions of the relevant institutions relating to such cases" (point 2);
 - "to make recommendations to the Government, the Assembly and other competent institutions of the Republic of Kosovo on matters relating to promotion and protection of human rights and freedoms, equality and non-discrimination" (point 5);
 - "to publish notifications, opinions, recommendations, proposals and his/her own reports" (point 6);
 - "to recommend promulgation of new Laws in the Assembly, amendments of the Laws in force and promulgation or amendment of administrative and sub-legal acts by the institutions of the Republic of Kosovo" (point 7);

- “to prepare annual, periodical and other reports on the situation of human rights and freedoms, equality and discrimination and conduct research on the issue of human rights and fundamental freedoms, equality and discrimination in the Republic of Kosovo” (point 8); and
 - “to recommend to the Assembly the harmonization of legislation with International Standards for Human Rights and Freedoms and their effective implementation” (point 9).
6. By submitting this report to the responsible institutions, the Ombudsperson intends to exercise the abovementioned constitutional and legal responsibilities.

LEGAL BACKGROUND

7. The purpose of the Law on KPCVA, according to Article 1, is to determine the organization, duties and responsibilities of this Agency. These duties and responsibilities are provided in more detail in Article 4 of the Law.
8. Two of these responsibilities are as follows:
- (1) “to administrate property on the request of successful claimant” (*ibid*, Article 4, paragraph 2, subparagraph 4); and
 - (2) “to implement voluntary rental scheme for properties under the administration of the Agency” (*ibid*, Article 4, paragraph 2, subparagraph 5).
9. The details of the aforementioned rental scheme are set out in Article 21 of the Law. According to this scheme, “[t]he income collected from the rent of the abandoned private property and socially owned property is held on deposit in a separate bank account for rightful owners, while the rent collected for properties with identified owners or property right holders is paid to the owner/user right holder. The Agency shall retain ten percent (10%) of the rental amount to cover administrative costs” (*ibid*, Article 21, paragraph 3).
10. However, the administration of property by KPCVA, including the administration of the rental scheme, is not unlimited in terms of time. Rather, the Law on KPCVA establishes a deadline after which the Agency is obliged to waive the administration of the property: “The Agency shall administer the properties and implement the rental scheme in accordance with this article, at latest eighteen months (18) from the entry into force of the present Law” (*ibid*, Article 21, paragraph 7).
11. Under Article 32 of the Law, it enters into force 15 days after its publication in the Official Gazette. The Law was published in the Official Gazette on 3 November 2016. Therefore, the Law entered into force on 18 November 2016 which means that the 18-month deadline expires on 18 May 2018.
12. With regard to this deadline, “The Agency is obliged to inform all property right holders or possession right holders who have their properties under the administration of the Agency or under the rental scheme, about the deadline for the end of administration of their property by the Agency” (*ibid*, Article 21, paragraph 8).
13. However, the information process seems to have been delayed more than it should. According to Article 30 of the Law in question, “The Government of Republic of Kosovo, on proposal of the Agency, shall issue subsidiary legislation for implementation

of this law within the period of ninety (90) days from entry into force of this Law”, which means on 18 February 2017 the latest.

14. However, the Government failed to respect this deadline, as it waited until 24 July 2017 to issue the Administrative Instruction (GRK) No. 07/2017 on Procedures, Conditions and Criteria for the End of the Administration of Properties under Administration and those Included in the Rental Scheme of the Kosovo Property Comparison and Verification Agency.
15. Article 6, paragraph 1 of this Administrative Instruction stipulates that: “The Agency shall be obliged within an optimal deadline to inform all parties, in writing on the last deadline for the end of administration of properties according to the procedures established for the notification of parties in the Regulation on Duties, responsibilities and Organization of the Executive of the Agency No.10/2017”.
16. The very late issuance of this sub-legal act gives KPCVA a shorter time available to complete all necessary notifications until the expiration of 18-month deadline.
17. In addition to the responsibility for administrating property and rental scheme, another legal responsibility of the KPCVA is “to implement Decisions of PCC [Property Claims Commission], PVAC [Property Verification and Adjudication Commission] and Housing Property Claim Commission” (Law on KPCVA, Article 4, paragraph 2, subparagraph 3).
18. In particular, “Remedies for execution of a decision may include . . . eviction” (*ibid*, Article 18, paragraph 1). According to the Law, execution of the eviction decision, in general, is the responsibility of the staff of the Agency, in cooperation with the State Police: “An eviction shall be executed by the responsible officer of the Agency, with the support of the law enforcement authorities” (*ibid*, Article 19, paragraph 3).
19. In cases where the property is reoccupied within 72 hours after the eviction has occurred, the Agency has again the competence, upon notification by the claimant, to “re-execute it once more by re-evicting occupants from the property”, in accordance with the procedure foreseen in the Law (*ibid*, Article 19, paragraph 6).
20. However, after the second eviction, the Law obliges the Agency to waive the case: "For any subsequent re-occupation of the same property, the **rules of the general enforcement procedure** shall be applicable based on the same decision/judgment and eviction order as an enforcement document "(*ibid*, Article 19, paragraph 7, emphasise is added).
21. These “general enforcement procedures”, as provided by Law No. 04/L-139 on Enforcement Procedure, require the owner to privately engage a private enforcement agent for execution of the eviction decision (*ibid*, Article 3, paragraph 1, and Article 4, paragraph 1).

EVALUATION

22. The Ombudsperson considers that revoking these two competencies from the scope of KPCVA - the competence to administer properties, including the renting scheme, as well as the competence to carry out evictions after two occupations of the same property - is a violation of the **right to own property**, according to the Constitution of the Republic of Kosovo and European and international human rights instruments.

A. Revoking KPCVA's competence to administer property, including administration of renting scheme, after the 18-month deadline, constitutes a violation of right to own property

23. According to Article 46, paragraph 1 of the Constitution of the Republic of Kosovo (hereinafter: the "Constitution"): "The right to own property is guaranteed". The right to own property, just like all the "[t]he fundamental rights and freedoms guaranteed by this Constitution *may only be limited by law*" (*ibid*, Article 55, paragraph 1, emphasise is added). Likewise, Article 1 of the First Protocol to the European Convention on Human Rights (hereinafter: "ECHR") provides that: "No one shall be deprived of his possessions except . . . *subject to the conditions provided for by law*" (emphasise is added). This right, as a right set forth in the ECHR Protocol, "[is] guaranteed by this Constitution" (Constitution, Article 22).
24. Article 53 of the Constitution should be taken into account for interpretation of these constitutional provisions, which stipulates that "human rights and fundamental freedoms guaranteed by this Constitution shall be interpreted consistent with the court decisions of the European Court of Human Rights" (hereinafter: "ECtHR").
25. By applying the principles of the right to own property in the context of property restitution, the ECtHR's tendency is to give each country "wide margin of appreciation" to establish its own criteria and conditions for gaining the right to restitution. *See, e.g., Gratzinger and Gratzingerova v. The Czech Republic* (Application No. 39794/98, ECtHR, 10 July 2002), paragraphs 68-77.
26. However, the ECtHR supports another principle with the same rigidity: each country, after establishing the legal criteria for obtaining the right to restitution of property, is obliged to apply these criteria until the end. This obligation has two constitutional grounds:
27. First, Article 1 of the ECHR obliges countries to "secure to everyone within their jurisdiction the rights and freedoms defined" in this Convention. According to ECtHR, "The discharge of this general duty may entail *positive obligations* inherent in ensuring the effective exercise of the rights guaranteed by the Convention" (*Brionowski v. Poland*, Application No. 31443/96, ECtHR, 22 June 2004; emphasise is added, paragraph 143). In particular, in the context of the right to own property, "those positive obligations may require the State *to take the measures necessary to protect the right of property*" (*ibid*; emphasise is added).
28. Secondly, the State's obligation to execute decisions on the restitution of property is based on the principle of *legal certainty*, which is included as part of the aforementioned constitutional requirement that any restriction of the right to own property should be provided by law. Therefore, "While the Convention does not impose an obligation on the States to restore confiscated assets . . . , once a solution has been adopted by a State, it must be implemented with reasonable clarity and coherence, in order to avoid, in so far as possible, legal uncertainty and ambiguity for the legal persons concerned by the measures to implement it" (*Paduraru v. Romania*, Application No. 63252/00, ECtHR, 1 December 2005, paragraph 92). Furthermore, "each . . . State must equip itself with an *adequate and sufficient legal arsenal* to ensure compliance with the positive obligations imposed on

- it”, including the positive obligation to protect the right to own property (*ibid*, paragraph 93; emphasise is added).
29. The Ombudsperson considers that revoking KPCVA's competence to administer property and rental scheme after the 18-month deadline constitutes a violation of this positive obligation as outlined in the abovementioned ECtHR decisions as well as in many international instruments.
 30. According to the United Nations' Guidelines Principles on Internal Displacement, for example, “Property and possessions left behind by internally displaced persons should be protected against destruction and arbitrary and illegal appropriation, occupation or use” (*ibid*, Principle 21, paragraph 3).
 31. Moreover, these Principles underline that it is the obligation of state authorities to protect the properties of returned and resettled internally displaced persons: “Competent authorities have the duty and responsibility to assist returned and/or resettled internally displaced persons to recover, *to the extent possible*, their property and possessions which they left behind or were dispossessed of upon their displacement [...]” (*ibid*, Principle 29, paragraph 2; emphasise is added).
 32. This provision makes it clear that the State's positive obligation cannot be limited by an 18-month artificial deadline. This obligation continues “to the extent possible”. The Ombudsperson has no evidence that KPCVA *is unable* to continue the administration of property and rental scheme after the expiration of 18-month deadline.
 33. On this point, the United Nations' Housing and Property Restitution for Refugees and Displaced Persons Principles (the so-called "Pinheiro Principles") provide further support, highlighting the State's positive obligation to protect the right to own property.
 34. For example, Principle 12, paragraph 1, stipulates that: “States should establish and support . . . procedures, institutions and mechanisms to assess and enforce housing, land and property restitution claims. In cases where existing procedures, institutions and mechanisms can effectively address these issues, adequate financial, human and other resources should be made available to facilitate restitution in a just and timely manner”.
 35. Also, Principle 12, paragraph 3, stipulates that: “States should take *all appropriate* administrative, legislative and judicial *measures* to support and facilitate the housing, land and property restitution process. States should provide all relevant agencies with adequate financial, human and other resources to successfully complete their work in a just and timely manner” (emphasise is added).
 36. Then, Principle 20, paragraph 1, stipulates that: “States should designate specific public agencies to be entrusted with enforcing housing, land and property restitution decisions and judgements” and continues in paragraph 2, stipulating that: “States should ensure, through law and other appropriate means, that local and national authorities are legally obligated to respect, implement and enforce decisions and judgements made by relevant bodies regarding housing, land and property restitution”.
 37. All these principles clarify that the state cannot waiver the protection of property right of displaced persons. This protection is part of its positive obligation. Termination of the

only existing property management mechanism after the 18 months deadline is a failure to comply with this obligation.

38. The Ombudsperson also considers that such interruption may have serious consequences due to some special circumstances of the Republic of Kosovo.
39. First, the continuous inability of displaced owners to return may result in non-administration of property that leads to illegal, repeated and unmonitored occupation.
40. Secondly, such consequences may deteriorate due to delays in issuing the Administrative Instruction No.07/2017 mentioned above. Delays in issuing this sub-legal act will certainly increase the risk of failing to inform all owners in relation to the 18 months deadline.
41. Third, KPCVA is not mandated to work in Serbia, Montenegro, Macedonia or other countries where most of the property owners currently live. Therefore, a longer period of time than this short time limit is required to notify all affected parties.
42. Fourth, according to the Kosovo National Strategy on Property Rights, “the administration of properties by the KPA has, however, proved a popular remedy with claimants, and *discontinuing KPA administration of these properties, without establishing a sustainable mechanism to monitor, track and provide information on the number and state of these properties, may increase the number of illegal occupants*” (*ibid*, Annex 4, p. 134; *emphasis is added*).
43. Due to all aforementioned reasons, the Ombudsperson concludes that setting the 18 months deadline on administration of property and the rental scheme constitutes a violation of the property right under the Constitution and European and international human rights instruments.

B. Revoking KPCVA's competence to conduct evictions after two occupations of the same property constitutes a violation of property rights

44. The Ombudsperson also concludes that transferring the burden on enforcement of eviction decisions to owners constitutes a violation of property right.
45. Based on the ECHR's decisions above, the Ombudsperson considers that, upon the transfer of eviction decisions to the owners, the Law prevents fulfilment of positive obligation to protect property rights, including obligations to ensure that “once a solution has been adopted by a State, it must be implemented with reasonable clarity and coherence, in order to avoid, in so far as possible, legal uncertainty and ambiguity for the legal persons concerned by the measures to implement it” (*Paduraru*, ECHR, *op. cit.*, par. 92).
46. Forcing the Agency to waive the commission of eviction after two reoccupations, the Law violates the obligation that “each . . . State must equip itself with an *adequate and sufficient legal arsenal* to ensure compliance with the positive obligations imposed on it” (*ibid*, par. 93; *emphasis is added*).
47. There are good reasons to believe that transferring the responsibility of private enforcement of eviction decisions to owners cannot serve as an efficient solution. Initially, the experiences of other countries with regards to this area, namely the

experiences in Iraq and Bosnia and Herzegovina, show that when the state agency responsible for making restitution decisions does not have the power to ensure the **enforcement** of such decisions, a large number of decisions remain unenforced at all.

48. For instance, the Iraq Commission for the Resolution of Real Property Disputes (CRRPD) is the institution responsible for adjudicating individual cases, however the power to enforce CRRPD's decisions belongs to the Ministry of Justice. Due to the ministry's lack of capacity to enforce "a significant number of successful claimants face difficulties in having their CRRPD restitution decisions enforced" (Peter Van der Auweraert, "Property Restitution in Iraq", 2007, p. 9).
49. The experience of Bosnia and Herzegovina is similar in this regard. The state institution responsible for deciding on individual cases in Bosnia and Herzegovina was the Commission for Real Property Claims (CRPC). However, same as in Iraq, this Commission lacked the authority to ensure enforcement of its own decisions. Due to this "lack of a clear enforcement mandate", among others, the CRPC failed to respect the property right of displaced persons during the war (Rhodri C. Williams, "Post-Conflict Property Restitution in Bosnia: Balancing Reparations and Durable Solutions in the Aftermath of Displacement", 2006, p. 2).
50. The experiences of Iraq and Bosnia and Herzegovina are a strong warning to our Republic: Revoking KPCVA's competence to enforce its decisions, even for just some decisions, will present a major obstacle in fulfilling the positive obligation in order to protect the property right and will jeopardize the legal security of displaced persons.
51. This conclusion is further strengthened by the abovementioned Pinheiro Principles. As noted above, the Principles stipulated that "states should designate specific **public** agencies to be entrusted with **enforcing** housing, land and property restitution decisions and judgments" (*ibid*, Principle 20, par. 1; in bold). Additionally, "States should ensure, through law and other appropriate means, that **local and national authorities** are legally obligated to respect, implement and **enforce** decisions and judgments made by relevant bodies regarding housing, land and property restitution" (*ibid*, Principle 20, par. 2).
52. As clarified in the citations, the drafters of the Pinheiro Principles— following a lengthy consultation process with legal experts, UN agencies, countries and civil society organizations (*see* Scott Leckie, Introduction, Pinheiro Principles, p. 4) — have finally demanded countries to make **state** institutions ("specific public agencies" and "local and national authorities") responsible for the task of enforcing decisions. This shows that the drafters of the principles have ascertained that the enforcement of property restitution decisions is an important, delicate and difficult work, and therefore cannot be left in private hands. The Law on KPCVA does that exact mistake, by delegating a part of eviction decisions to private enforcement agent, which in a way disallows the fulfilment of positive obligations by the Republic to protect property and guarantee legal security for displaced persons.
53. Economic difficulties of displaced persons in general make the transfer of the responsibility to enforce eviction decisions to private enforcement agents even more inadequate. The Danish Refugee Council's Report in 2009 states that displaced persons face serious economic obstacles (<https://drc.ngo/media/1659347/idps-from-and-within->

[kosovo.pdf](#)). However, private enforcement agents charge a fee to the parties for their services. Considering the economic situation of displaced persons, they will not be able to pay tariffs for enforcement services if their property is reoccupied after the second eviction conducted by the KPCVA. Hence, revoking this Agency's competence to enforce eviction decisions is likely to leave these decisions unenforced

54. The fact that displaced persons in the Republic of Kosovo have, in general, serious economic difficulties, increases the need of fulfilling the positive obligations of state institutions, according to the Pinheiro Principles, as well as Basic Principles and Guidelines on the Right to a Remedy and Reparation for Victims of Gross Violations of International Human Rights Law and Serious Violations of International Humanitarian Law. Both these instruments emphasize the importance of ensuring *access to justice* for victims of human rights violations.
55. Pinheiro's Principle No. 13 is titled "Accessibility of restitution claims procedures". This principle stipulates that "States should ensure that *all aspects* of the restitution claims process, including appeals procedures, are . . . timely, accessible, *free of charge*, and are age and gender sensitive" (*ibid*, Principle 13, point 2, emphasis is added). Likewise, "States should ensure that adequate legal aid is provided, *if possible free of charge*, to those seeking to make a restitution claim" (*ibid*, Principle 13, point 11).
56. The Ombudsperson considers that the phrase "restitution claims procedures" includes *all* steps of these procedures, including the final enforcement of an eviction decision, at least in cases where such a solution is ordered after reviewing the claim. Therefore, by requiring some displaced persons to pay themselves for the enforcement of eviction decisions, the Law on KPCVA violates the principle of access to justice according to the Pinheiro Principles.
57. The principle of access to justice is also emphasized in the Basic Principles and Guidelines on the Right to a Remedy and Reparation for Victims of Gross Violations of International Human Rights Law and Serious Violations of International Humanitarian Law (hereinafter "Basic Principles and Guidelines"). This instrument was approved by the United Nations General Assembly (*see* General Assembly Resolution 60/147 of 16 December 2005). Resolutions adopted by the United Nations General Assembly are considered to be indicators of customary international law. Therefore, adoption of the Basic Principles and Guidelines by the General Assembly has important implications for the Republic of Kosovo, as long as the Constitution stipulates, strictly and without exception, that "the Republic of Kosovo respects international law" (*ibid*, Article 16, par. 3).
58. Basic Principles and Guidelines expressly stipulate that "the obligation to respect, ensure respect for and implement international human rights law . . . includes, inter alia, the duty to . . . provide those who claim to be victims of a human rights or humanitarian law violation with equal and effective access to justice, . . . *irrespective of who may ultimately be the bearer of responsibility for the violation*" (*ibid*, Article 3, par. c; emphasis is added).

59. Also, Basic Principles and Guidelines stipulate that “States shall . . . enforce domestic judgements for reparation against individuals or entities liable for the harm suffered. . . . To that end, states should provide under their domestic laws effective mechanisms for the enforcement of reparation judgements” (*ibid*, Article 17). Henceforth, the Pinheiro Principles, Basic Principles and Guidelines strongly emphasize the obligation of the Republic of Kosovo to ensure that KPCVA holds the competence to enforce eviction decisions after each reoccupation and not transfer this responsibility to private enforcement system.
60. Moreover, the decision to revoke this competence appears to be even more illogical considering that concerned cases are those wherein respective properties have been occupied more than twice — in other words, cases in which enforcement of the eviction is *extremely difficult*. In such cases, the assistance of the Kosovo Police to KPCVA in handling the eviction is more necessary than ever. By transferring this power to private enforcement agents, in such cases the Law on KPCVA increases the risk of non-fulfilment of state’s obligation to protect property rights and jeopardizes even more the legal certainty of displaced persons.

CONCLUSIONS AND RECOMMENDATIONS OF THE OMBUDSPERSON

A. Conclusions of the Ombudsman

61. Based on the above assessment, the Ombudsman concludes that:

(1) Law No. 05/L-010 on the Kosovo Property Comparison and Verification Agency, Article 21, paragraph 7 (“The Agency shall administer properties and implement the rental scheme in accordance with this Article, at latest eighteen months (18) from the entry into force of the present law”) constitutes a violation of the right to property and is contrary to the Constitution of the Republic of Kosovo and European and international human rights instruments; and

62. Law No. 05/L-010 on the Kosovo Property Comparison and Verification Agency, Article 19, par. 7 (“For any subsequent re-occupation of the same property, the rules of the general enforcement procedure shall be applicable based on the same decision/judgment and eviction order as an enforcement document”) constitutes a violation of the right to property and is in contradiction to the Constitution of the Republic of Kosovo and European and international human rights instruments.

B. Recommendations of the Ombudsperson

63. Based on these findings, and in accordance with Article 135, paragraph 3 of the Constitution of the Republic of Kosovo and Article 16, paragraph 4 of the Law No. 05/L-019 on Ombudsperson, the Ombudsperson recommends amending and supplementing the Law No. 05/L-010 on Kosovo Property Comparison and Verification Agency, as follows:

(1) Article 21, paragraph 7, of the Law on KPCVA (“The Agency shall administer the properties and implement the rental scheme in accordance with this article, at latest eighteen months (18) from the entry into force of the present Law”), be removed entirely;

(2) Article 19, paragraph 7, of the Law on KPCVA (“For any subsequent re-

occupation [after two evictions] of the same property, the rules of the general enforcement procedure shall be applicable based on the same decision/judgment and eviction order as an enforcement document”), be removed entirely; and

- (3) Article 19, paragraph 6, Law on KPCVA, shall be amended as follows: “***For any reoccupation*** following the execution date of an eviction order, after notification by the claimant for illegal re-occupation of the property, the Agency shall re-execute it once more by re-evicting occupants from the property based on a newly issued warrant, following the procedure in paragraph 3-5 of this Article. With regard re-eviction the Agency shall inform the applicant of the day of re-eviction and invite him/her to be present. In case the claimant or his/her representative fails to participate in re-eviction, the Agency shall enforce eviction and issue repossession acknowledgment”.

Pursuant to Article 132, paragraph 3 of the Constitution of the Republic of Kosovo (“Every organ, institution or other authority exercising legitimate power of the Republic of Kosovo is bound to respond to the requests of the Ombudsperson and shall submit all requested documentation and information in conformity with the law”) and Article 28 of Law No. 05/L-019 on Ombudsperson (“Authorities to which the Ombudsperson has addressed recommendation, request or proposal for undertaking concrete actions, . . . must respond within thirty (30) days. The answer should contain written reasoning regarding actions undertaken about the issue in question”), we kindly ask you to inform us of the actions you will take regarding this issue.

Respectfully,

Hilmi Jashari
Ombudsperson