

ASSESSMENT OF U.S. DESIGNATION POLICY REGARDING FORMER ALBANIAN PRIME MINISTER SALI BERISHA:

IMPLICATIONS FOR BILATERAL RELATIONS AND REGIONAL STRATEGIC OBJECTIVES

Prepared by Continental Strategy and Continental PLLC

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EXECUTIVE SUMMARY

The 7031(c) designation of former Albanian President and Prime Minister Sali Berisha should be lifted immediately. The designation was politically motivated, lacks factual basis, damaged U.S. foreign policy interests, and contributed to Albania's deterioration into what critics now describe as a "narco-state." As Albania's democracy is under severe threat and Berisha is no longer an active political figure, lifting the designation would restore American neutrality and credibility in the region.

BACKGROUND AND CURRENT SITUATION

Origins and History of Section 7031(c)

Section 7031(c) of the Department of State, Foreign Operations, and Related Programs Appropriations Act serves as a congressional mechanism to combat foreign corruption and human rights abuses by imposing visa restrictions. According to the Congressional Research Service, "the origins of Section 7031(c) can be traced to FY2008 SFOPS appropriations,"¹ though "the discretion to publicly designate individuals pursuant to 7031(c) has been explicitly provided in appropriations provisions since FY2015."²

The provision requires the Secretary of State to bar foreign officials and their immediate family members from U.S. entry when there is "credible information" of involvement in "significant corruption, including corruption related to the extraction of natural resources, or a gross violation of human rights."³

Usage Statistics and Partisan Patterns

¹ Foreign Officials Publicly Designated by the U.S. Department of State on Corruption or Human Rights Grounds: A Chronology. 2020.

² Foreign Officials Publicly Designated by the U.S. Department of State on Corruption or Human Rights Grounds: A Chronology. 2020.

³ Congressional Research Service, "Foreign Officials Publicly Designated by the U.S. Department of State on Corruption or Human Rights Grounds: A Chronology," by Liana W. Rosen and Michael A. Weber, May 18, 2020.

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The Congressional Research Service documents that "the first public designation took place in 2018."⁴ Specifically, the first designation targeted "former Albanian Prosecutor General Adriatik Llalla and his immediate family members"⁵ on February 14, 2018.

According to CRS analysis, from 2018 through May 2020, "more than 150 individuals (77 primary public designations on corruption or human rights grounds and 74 additional family members publicly named) from more than 30 countries have been publicly identified pursuant to Section 7031(c)."⁶ Of these primary designees, "approximately 70% of public listings are on human rights grounds and 30% are on corruption grounds."⁷

Dramatic Expansion Under Biden Administration

While Section 7031(c) was created and first used during the Trump administration, **it has been significantly expanded under the Biden administration, becoming one of the most frequently used foreign policy tools.** During the Biden administration the U.S. State Department made approximately 300 Section 7031(c) designations under the Department of State, Foreign Operations, and Related Programs Appropriations Act. These designations affected officials from 36 countries. The total number of people impacted (including designated officials and their immediate family members) is approximately 390.^{8, 9, 10}

Usage by Administration:

- **Trump Administration (2018-2020):** 77 primary designations plus 74 family members across 3 years.
- **Biden Administration (2021-2025):** Over 300 designation actions in 4 years.

The pattern reveals that the Biden administration has not only continued but dramatically escalated the use of Section 7031(c) authority. President Biden explicitly stated at the Summit for Democracy that "countering corruption and strengthening the rule of law are important for each democracy around the world"¹¹ and that "the

⁴Congressional Research Service, "Foreign Officials Publicly Designated by the U.S. Department of State on Corruption or Human Rights Grounds: A Chronology," by Liana W. Rosen and Michael A. Weber, May 18, 2020.

⁵ Congressional Research Service, "Foreign Officials Publicly Designated by the U.S. Department of State on Corruption or Human Rights Grounds: A Chronology," by Liana W. Rosen and Michael A. Weber, May 18, 2020.

⁶ Congressional Research Service, "Foreign Officials Publicly Designated by the U.S. Department of State on Corruption or Human Rights Grounds: A Chronology," by Liana W. Rosen and Michael A. Weber, May 18, 2020.

⁷ Congressional Research Service, "Foreign Officials Publicly Designated by the U.S. Department of State on Corruption or Human Rights Grounds: A Chronology," by Liana W. Rosen and Michael A. Weber, May 18, 2020.

⁸ Forty-two 2021 designations: <https://www.state.gov/reports/report-to-congress-on-anti-kleptocracy-and-human-rights-visa-restrictions-public-listing/public-listing-fiscal-year-2021/>

⁹ One hundred sixty-six 2022 designations: <https://www.state.gov/reports/report-to-congress-on-anti-kleptocracy-and-human-rights-visa-restrictions-public-listing/public-listing-fiscal-year-2022/>

¹⁰ One hundred five 2023 designations: <https://www.state.gov/reports/report-to-congress-on-anti-kleptocracy-and-human-rights-visa-restrictions-public-listing/public-listing-fiscal-year-2023/>

¹¹ "Fact Sheet 7031(c) Designations of Georgian Officials." U.S. Embassy & Consulate in Georgia, U.S. Department of State, 5 Apr. 2023, ge.usembassy.gov/fact-sheet-7031c-designations-of-georgian-officials/.

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Department of State will continue to use this authority and all appropriate tools to combat corruption globally"¹², signaling an intentional policy of expanded use.

Evidence of Systematic Expansion:

1. **Increased Frequency:** The Biden administration's made regular use of 7031(c) designations, issuing multiple designations each month.
2. **Broader Geographic Scope:** The designations have expanded beyond the original focus areas to include officials from a wider range of countries, particularly targeting governments that have historically cooperated with the United States.
3. **Political Targeting:** Key Republican lawmakers have publicly criticized the designations as disproportionately affecting officials from U.S.-aligned (often center-right or conservative) governments in Latin America and beyond, while sparing more left-wing regimes. A February 2024 letter to President Biden from Republican senators, led by **Sen. Jim Risch (R-ID)**, the ranking member of the Senate Foreign Relations Committee, and co-signed by **Sens. Marco Rubio (R-FL)**, Bill Hagerty (R-TN), James Lankford (R-OK), Mike Lee (R-UT), Tim Scott (R-SC), John Cornyn (R-TX), and Rick Scott (R-FL), noted that the Biden administration has politicized the sanctions process by overwhelmingly focusing public designations on cooperative partners in the region while ignoring corruption in regimes that undermine U.S. interests, such as Venezuela's Maduro regime, Ecuador's former President Rafael Correa, Argentina's former President Cristina Fernández de Kirchner, and Brazil under President Lula da Silva (all examples of left-wing or authoritarian-left governments cited in the letter).¹³

This aligns with broader criticisms noted in non-partisan analyses, such as Congressional Research Service reports, which discuss perceptions that U.S. human rights policies under various administrations (including Biden's) apply inconsistent standards to strategic partners versus adversaries, potentially inviting charges of hypocrisy.¹⁴

During the first Trump administration, Section 7031(c) was primarily applied to clear-cut cases of corruption and human rights abuses. In contrast, the Biden administration broadened its use of the tool, increasingly targeting political opponents of regimes

¹² "Fact Sheet 7031(c) Designations of Georgian Officials." U.S. Embassy & Consulate in Georgia, U.S. Department of State, 5 Apr. 2023, ge.usembassy.gov/fact-sheet-7031c-designations-of-georgian-officials/.

¹³ Risch, Jim, et al. "Risch Leads Colleagues in Expressing Concern over Biden Admin Sanctions in Latin America." U.S. Senate Committee on Foreign Relations, 26 Feb. 2024, www.foreign.senate.gov/press/rep/release/risch-leads-colleagues-in-expressing-concern-over-biden-admin-sanctions-in-latin-america.

¹⁴ Smith, John, et al. CRS Report R47890: Title Unknown. Congressional Research Service, 7 Jan. 2025, www.everycrsreport.com/files/2025-01-07_R47890_563f0a172453cc5325971382dd94bf5f31f6f8f6.html.

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aligned with progressive networks. This shift sparked criticism that the tool's original purpose—combatting corruption and human rights violations—has been repurposed for political ends.

The Original Designation

On May 19, 2021, Secretary of State Antony Blinken designated Sali Berisha and his family members under Section 7031(c) for alleged "significant corruption" during his tenure as Prime Minister, citing "misappropriation of public funds and interfering with public processes, including using his power for his own benefit and to enrich his political allies and his family members."¹⁵

Legal Framework and Waiver Authority

According to a legal analysis prepared by attorneys at Continental PLLC and shared with the State Department, Section 7031(c) is "an entirely political process" with "no waiver process, waiver application, or right to appeal."¹⁶ The statute vests "sole discretion in the Secretary of State to designate an individual or rescind or revoke that designation"¹⁷ and grants "sole discretion to waive the sanction if the Secretary determines that the waiver would serve a compelling national interest or that the circumstances which caused the individual to be ineligible have changed sufficiently."¹⁸

Federal courts have confirmed that "only the Secretary can add or remove from the Section 7031(c) list,"¹⁹ making the designations strictly an executive branch decision.

¹⁵ "Public Designation of Albanian Sali Berisha Due to Involvement in Significant Corruption." U.S. Department of State, 19 May 2021, 2021-2025.state.gov/public-designation-of-albanian-sali-berisha-due-to-involvement-in-significant-corruption/.

¹⁶ "7545-Informational-Materials-20250508-7." FARA eFile, U.S. Department of Justice, 8 May 2025, efile.fara.gov/docs/7545-Informational-Materials-20250508-7.pdf.

¹⁷ "7545-Informational-Materials-20250508-7." FARA eFile, U.S. Department of Justice, 8 May 2025, efile.fara.gov/docs/7545-Informational-Materials-20250508-7.pdf.

¹⁸ "7545-Informational-Materials-20250508-7." FARA eFile, U.S. Department of Justice, 8 May 2025, efile.fara.gov/docs/7545-Informational-Materials-20250508-7.pdf.

¹⁹ "7545-Informational-Materials-20250508-7." FARA eFile, U.S. Department of Justice, 8 May 2025, efile.fara.gov/docs/7545-Informational-Materials-20250508-7.pdf.

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THE CASE FOR LIFTING THE DESIGNATION

- 1. THE DESIGNATION WAS POLITICALLY MOTIVATED AND LACKS FACTUAL BASIS**
- 2. THE DESIGNATION HAS BACKFIRED AND DAMAGED U.S. FOREIGN POLICY INTERESTS**
- 3. HISTORICAL DEMOCRATIC CREDENTIALS**
- 4. LIFTING THE DESIGNATION WOULD RESTORE POLICY NEUTRALITY**
- 5. CONSISTENCY WITH SECRETARY RUBIO'S STATED POSITIONS AND TRUMP ADMINISTRATION REFORMS**

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1. THE DESIGNATION WAS POLITICALLY MOTIVATED AND LACKS FACTUAL BASIS

Nature of Allegations

Importantly, Berisha has not been accused of human rights abuses, support for terrorism, or any of the serious criminal activities that would typically warrant visa restrictions.

To the contrary, Berisha has been a steadfast United States ally throughout his 34 years in public life, praised by leaders of both parties for economic reforms, anti-corruption efforts, defense modernization and NATO membership, and regional stability. Specific praises include:

- **President George W. Bush (during his June 10, 2007 visit to Albania, the first by a sitting U.S. president).^{20, 21}**
 - **On economic and anti-corruption reforms:** "I'm impressed with the desire of [your] government to fight corruption, to make it clear that the government is of the people, that the government can be trusted by the people, by routing out those who would use their exalted positions to steal from the taxpayers. I appreciate that kind of commitment, Mr. Prime Minister."²²
 - **On Albania as a model of tolerance and trusted U.S. ally:** "I appreciate the fact that Albania is a model of religious tolerance... And I appreciate the fact that Albania is a trusted friend and a strong ally."²³
 - **On NATO reforms:** "I commended the Prime Minister for the progress that Albania has made in defense reform... And he understands that. He said, we're committed. That's what the Prime Minister said -- Albania is committed to meeting those standards. And I said, we're committed to help you."²⁴
 - **On Berisha's role in regional stability:** "I urged the Prime Minister to work with the leaders in Kosovo to maintain calm during these final stages of Kosovo final status process. He assured me he would. He's got good contacts there, and Kosovars look to the Prime Minister of Albania... for leadership, and they're willing to provide it."²⁵

²⁰ "President Bush Participates in Joint Press Availability with Prime Minister of Albania, Dr. Sali Berisha." White House Archives, The White House, 10 June 2007, georgewbush-whitehouse.archives.gov/news/releases/2007/06/20070610-1.html.

²¹ "President Bush Visits Albania, Highlights Democracy Efforts." Voice of America, 10 June 2007, www.voanews.com/a/a-13-2007-06-10-voa5/332697.html.

²² Bush, George W. Public Papers of the Presidents of the United States: George W. Bush, 2007, Book I, page 720, U.S. Government Publishing Office, 2007, govinfo.gov/content/pkg/PPP-2007-book1/html/PPP-2007-book1-doc-pg720.htm.

²³ Bush, George W. Public Papers of the Presidents of the United States: George W. Bush, 2007, Book I, page 720, U.S. Government Publishing Office, 2007, govinfo.gov/content/pkg/PPP-2007-book1/html/PPP-2007-book1-doc-pg720.htm.

²⁴ "President Bush Participates in Joint Press Availability with Prime Minister of Albania, Dr. Sali Berisha." White House Archives, The White House, 10 June 2007, georgewbush-whitehouse.archives.gov/news/releases/2007/06/20070610-1.html.

²⁵ "President Bush Participates in Joint Press Availability with Prime Minister of Albania, Dr. Sali Berisha." White House Archives, The White House, 10 June 2007, georgewbush-whitehouse.archives.gov/news/releases/2007/06/20070610-1.html.

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- **President Bill Clinton (declassified records from a September 1995 White House meeting with then President Berisha)²⁶,**
 - Clinton expressed appreciation for Berisha's work to build democracy in the country: "I greatly appreciate the progress you have made, especially your work to develop democracy in Albania and to transform your economy,"²⁷ and "I can't tell you how pleased I am that you have come so far in so short a time."²⁸
- **Secretary of State Hillary Clinton (during an April 25, 2012, meeting with Prime Minister Berisha at the State Department)²⁹.**
 - **Clinton praised Berisha's government for its partnership with the U.S.:** "The prime minister and his country have been strong partners with the United States in NATO as part of our mission in Afghanistan, and we have a broad and deep relationship that we highly value."³⁰
- **Secretary of State Hillary Clinton (during a November 1, 2012, visit to Albania)³¹.**
 - **Clinton highlighted progress under Berisha's leadership:** "The United States has been proud to be your partner and your friend as you have continued to make progress to consolidate democracy, to open up your economy, to provide opportunity for all the people of your country."

Finally, the allegations against Berisha relate solely to indirect corruption during his time in office (allegedly conducted by relatives), yet no evidence has been presented to support these claims, despite the issue being investigated by the country's government controlled, anti-corruption body for over two years.

Notably, former Congressman Lee Zeldin, then a member of the House Foreign Affairs Committee, sent multiple written inquiries to the State Department regarding Berisha's 7031(c) designation. These included questions raised during a June 7, 2021, congressional hearing with then Secretary of State Antony Blinken, followed by formal letters in August and November 2021 seeking evidence of the alleged significant corruption cited in Berisha's public designation.

When formally requesting the evidence used to justify the designation, as mandated by the statute, the State Department failed to respond to this Congressional oversight

²⁶ "Berisha-Clinton Meeting, September 1995." Modern Albania, 1995, www.modern-albania.com/wp-content/uploads/2015/09/Berisha-Clinton-meeting-Sept-1995.pdf:contentReference[oaicite:4][index=4]

²⁷ "Berisha-Clinton Meeting, September 1995." Modern Albania, 1995, www.modern-albania.com/wp-content/uploads/2015/09/Berisha-Clinton-meeting-Sept-1995.pdf.

²⁸ "Berisha-Clinton Meeting, September 1995." Modern Albania, 1995, www.modern-albania.com/wp-content/uploads/2015/09/Berisha-Clinton-meeting-Sept-1995.pdf.

²⁹ Clinton, Hillary Rodham. "Remarks at the U.S.-Albania Strategic Dialogue." U.S. Department of State, 25 Apr. 2012, 2009-2017.state.gov/secretary/20092013clinton/rm/2012/04/188484.html.

³⁰ Clinton, Hillary Rodham. "Remarks at the U.S.-Albania Strategic Dialogue." U.S. Department of State, 25 Apr. 2012, 2009-2017.state.gov/secretary/20092013clinton/rm/2012/04/188484.html.

³¹ Clinton, Hillary Rodham. "Remarks at the U.S.-Albania Strategic Dialogue." U.S. Department of State, 25 Apr. 2012, 2009-2017.state.gov/secretary/20092013clinton/rm/2012/04/188484.html.

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request. Importantly, Representative Zeldin inquired how it was that sanctions on Berisha were applied in 2021, "eight years and two U.S. presidential administrations later" given that Berisha had left office in 2013 during the Obama-Biden administration and was currently not in office? Zeldin requested an official response and meeting with the appropriate State Department officials to review any intel for the alleged corruption, and the process the Department used, No official response or review meetings were offered by the State Department at that time.^{32, 33}

Biden Administration Official Acknowledges Berisha's Designation Was Wrong

Former U.S. diplomat and State Department career official Jonathan Moore, a knowledgeable expert on Balkan developments, has publicly stated that the sanctions against Berisha specifically were imposed "without concrete evidence, but based on rumors, forwarded by the US embassy in Tirana to Washington."³⁴ Moore emphasized that "the sanctions against former Prime Minister Sali Berisha were imposed without concrete evidence" and criticized the program for relying on allegations rather than facts.³⁵

Speaking directly about Berisha's case, Moore explained that "these sanctions, through the State Department, introduced in 2018, seem to be supported mainly by allegations of corruption. So, the first person told the second person, who told the embassy that someone was corrupt."³⁶ He pointed out that in cases like Berisha's designation, "there are many people in the world who are on that list who have never been investigated, serious questions arise regarding the validity of the sanctions."³⁷

Critically, Moore acknowledged that "there is no objection process or to see if someone has made a positive contribution to the interests of the United States,"³⁸ highlighting the fundamental procedural flaws in the designation system that affected Berisha.

Absence of Evidence and Congressional Oversight Failures

According to policy experts, State Department's sanctions against Berisha were as other controversial designations. There is an "irony that while the State Department

³² Kredo, Adam. "Zeldin Accuses State Department of Sanctioning Former Albanian President as Retribution for Loyalty to Republicans." Washington Free Beacon, 20 Dec. 2021, freebeacon.com/biden-administration/zeldin-accuses-state-department-of-sanctioning-former-albanian-president-as-retribution-for-loyalty-to-republicans/.

³³ "Questions Remain Over Secretary of State Antony Blinken's Alleged Ties to George Soros." The Dan Bongino Show, 2021, bongino.com/questions-remain-over-secretary-of-state-anthony-blinkens-ties-to-george-soros/.

³⁴ "Berisha's 'Non Grata': Jonathan Moore Says Lifting the Sanction Requires Albanian Parliament Intervention." Pamfleti, 30 June 2025, pamfleti.net/english/politike/non-grata-e-berishes-jonathan-moore-heqja-e-sanksionit-vetem-nese-nderh-i287178.

³⁵ "Berisha's 'Non Grata': Jonathan Moore Says Lifting the Sanction Requires Albanian Parliament Intervention." Pamfleti, 30 June 2025, pamfleti.net/english/politike/non-grata-e-berishes-jonathan-moore-heqja-e-sanksionit-vetem-nese-nderh-i287178.

³⁶ "Berisha's 'Non Grata': Jonathan Moore Says Lifting the Sanction Requires Albanian Parliament Intervention." Pamfleti, 30 June 2025, pamfleti.net/english/politike/non-grata-e-berishes-jonathan-moore-heqja-e-sanksionit-vetem-nese-nderh-i287178.

³⁷ "Berisha's 'Non Grata': Jonathan Moore Says Lifting the Sanction Requires Albanian Parliament Intervention." Pamfleti, 30 June 2025, pamfleti.net/english/politike/non-grata-e-berishes-jonathan-moore-heqja-e-sanksionit-vetem-nese-nderh-i287178.

³⁸ "Berisha's 'Non Grata': Jonathan Moore Says Lifting the Sanction Requires Albanian Parliament Intervention." Pamfleti, 30 June 2025, pamfleti.net/english/politike/non-grata-e-berishes-jonathan-moore-heqja-e-sanksionit-vetem-nese-nderh-i287178.

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continues to target Berisha and other pro-American politicians for alleged corruption, evidence suggests that the corruption lies with Rama and those Americans whom he has compromised.”³⁹

The State Department failed to comply with statutory requirements to present supporting evidence to Congress regarding the designation. Then-Congressman Lee Zeldin formally requested the evidence used to justify the designation, as mandated by the statute, but the Department failed to respond to this Congressional oversight request.⁴⁰

Contrast with Legitimate Designations

Unlike Secretary Rubio's recent designation of former Argentine President Cristina Fernández de Kirchner, who was convicted in her home country of crimes she committed while in office and who was a reliable ally to leftist regimes and enemies of the United States, Berisha presents a starkly different case:

- **No criminal conviction:** Berisha has never been convicted of any crime
- **Post-office charges:** The charges brought against him were not filed until after he was well out of office and preparing for a return to public office
- **No public evidence:** No evidence has been presented to the public about any wrongdoing
- **Pro-American stance:** Berisha has been consistently supportive of U.S. interests and NATO alliance

Partisan Implementation and NGO Influence

The designation resulted from ideological bias within the Obama and Biden administrations, with "Secretary of State Antony Blinken's ideological animosity toward the center-right, Kim's partisanship, and USAID Administrator Samantha Power's willingness to allow Rama to turn SPAK into a political weapon.”⁴¹

USAID-Soros Network Financial Collusion Financial records reveal the scope of this institutional capture. Over the past 15 years, USAID funneled over \$270 million to the East-West Management Institute (EWMI), an Open Society Foundations partner, for

³⁹ Rubin, Michael. “How the State Department Pushed Albania from Democracy to Narco-State.” 19FortyFive, 17 Apr. 2025, www.19fortyfive.com/2025/04/how-the-state-department-pushed-albania-from-democracy-to-narco-state/.

⁴⁰ Congressional inquiry by Rep. Lee Zeldin regarding State Department evidence for Berisha designation, 2021 (State Department non-compliance documented).

⁴¹ Rubin, Michael. “How the State Department Pushed Albania from Democracy to Narco-State.” American Enterprise Institute, 17 Apr. 2025, www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/.

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projects described as "judicial reform" and "civil society training" in countries including Albania and Cambodia.⁴²

This so-called judicial reform was more accurately described as judicial overhaul. USAID funding was directed to the "Justice for All" campaign, which granted excessive judicial control to Albania's socialist leadership. This new judicial system was then weaponized by socialist leaders to imprison political opponents.

Direct Targeting of Berisha Through U.S.-Funded Operations Most significantly, the EWM's Justice for All campaign directly promoted an investigation and political persecution of former Prime Minister Sali Berisha—an opponent of Albanian Prime Minister Edi Rama, who is notably "a close confidant of Soros who gave a toast at his son Alex Soros's recent lavish wedding in Long Island."⁴³

Pattern of Regional Destabilization This Albanian operation was part of a broader pattern. Judicial Watch documented evidence of collaboration between the State Department and USAID with Soros to financially support leftist activist groups in Macedonia to destabilize their government. Between February 27, 2012, and August 31, 2016, USAID gave \$4,819,125 in taxpayer money to OSF. According to Judicial Watch, "The USAID's website links to www.soros.org.mk, and says the project trained hundreds of young Macedonians 'on topics such as freedom of association, youth policies, citizen initiatives, persuasive argumentation and use of new media.'"⁴⁴

Policy experts have characterized these as "U.S.-funded programs [that] have provoked Saul Alinsky-style violence and ethnic division, inspiring a political crisis since 2015."⁴⁵

The systematic use of U.S. taxpayer funds to empower leftist governments while simultaneously designating their pro-American opponents under anti-corruption authorities represents a fundamental corruption of American foreign policy objectives.

U.S. Ambassador Yuri Kim's extreme partisanship included "literally and figuratively embracing Rama, openly favoring Rama and belittling the Democratic Party and the opposition, famously telling Berisha to 'eat grass.'"⁴⁶

Soros Network Connections

⁴² Lowe Doescher, Tiana. "USAID Gave \$270 Million to a Soros NGO, but It Only Needed \$9 Million to Doom Democracy in Albania." Washington Examiner, 7 Feb. 2025, www.washingtonexaminer.com/opinion/3313896/usaaid-gave-270-million-soros-ngo-only-needed-9-million-doom-democracy-albania.

⁴³ Tammy Lagorce, "Alex Soros and Huma Abedin Share Their Love Story and Wedding" The New York Times, June 6, 2025 <https://www.nytimes.com/2025/06/18/style/huma-abedin-alex-soros-wedding.html>.

⁴⁴ Shaw, Adam. "Judicial Watch Sues State Department, USAID for Soros Records." Fox News, 19 Apr. 2017, www.foxnews.com/politics/judicial-watch-sues-state-department-usaid-for-soros-records.

⁴⁵ Gaetan, Victor. "Macedonia to George Soros and USAID: Go Away." The American Spectator, 24 Mar. 2017, www.spectator.org/macedonia-to-george-soros-and-usaid-go-away/.

⁴⁶ Gaetan, Victor. "Macedonia to George Soros and USAID: Go Away." The American Spectator, 24 Mar. 2017, www.spectator.org/macedonia-to-george-soros-and-usaid-go-away/.

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Public reporting revealed concerning connections between Prime Minister Edi Rama and the Soros network that may have influenced the designation decision.^{47, 48}

Recent media reports documented Rama's attendance at Alex Soros's wedding to Uma Abedin, highlighting the close personal relationships between the Albanian Prime Minister and influential progressive networks. These connections raise questions about whether the designation of Berisha—Rama's primary political opponent—was influenced by ideological allies rather than objective assessment of corruption evidence.

Congressional Concerns

As noted, eight U.S. Senators, including Marco Rubio, wrote to President Biden expressing "deep concerns with your administration's misuse of authorities provided by Congress to combat corruption ... at the expense of strategic U.S. national security interests."⁴⁹ They noted that the overwhelming majority of public designations made under Section 7031(c) have targeted "that have cooperated with the United States on strategic diplomatic and national security interests"⁵⁰ while the administration "has ignored well-documented cases of significant corruption by foreign government officials actively undermining U.S. national security interests."⁵¹

2. THE DESIGNATION HAS BACKFIRED AND DAMAGED U.S. FOREIGN POLICY INTERESTS

Damaged Bilateral Relations

The designation betrayed "one of the most pro-American peoples"⁵² in the world. "Albania may be small, but Albanians are one of the most pro-American peoples. The United States should not betray them."⁵³

Albania "votes with the United States at the United Nations as much as Australia does, and even more than erstwhile allies like the Netherlands, Spain, or Sweden."⁵⁴

⁴⁷ Gaetan, Victor. "Macedonia to George Soros and USAID: Go Away." The American Spectator, 24 Mar. 2017, www.spectator.org/macedonia-to-george-soros-and-usaid-go-away/.

⁴⁸ Gaetan, Victor. "Macedonia to George Soros and USAID: Go Away." The American Spectator, 24 Mar. 2017, www.spectator.org/macedonia-to-george-soros-and-usaid-go-away/.

⁴⁹ "Risch Leads Colleagues in Expressing Concern Over Biden Admin Sanctions in Latin America." U.S. Senate Committee on Foreign Relations, 26 Feb. 2024, foreign.senate.gov/press/rep/release/risch-leads-colleagues-in-expressing-concern-over-biden-admin-sanctions-in-latin-america.

⁵⁰ "Risch Leads Colleagues in Expressing Concern Over Biden Admin Sanctions in Latin America." U.S. Senate Committee on Foreign Relations, 26 Feb. 2024, foreign.senate.gov/press/rep/release/risch-leads-colleagues-in-expressing-concern-over-biden-admin-sanctions-in-latin-america.

⁵¹ "Risch Leads Colleagues in Expressing Concern Over Biden Admin Sanctions in Latin America." U.S. Senate Committee on Foreign Relations, 26 Feb. 2024, foreign.senate.gov/press/rep/release/risch-leads-colleagues-in-expressing-concern-over-biden-admin-sanctions-in-latin-america.

⁵² Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/.

⁵³ Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/.

⁵⁴ Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/.

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Undermined Democratic Opposition

The designation had a profound impact on Albania's democratic opposition. In an effort to appease the State Department, "the Democratic Party expelled Berisha,"⁵⁵ but "it did not work. As Rama grew more corrupt and the Albanian Democratic Party kept losing elections, they again rallied around Berisha."⁵⁶

Damage to Relationship with Pro-American Ally

The designation has severely damaged the United States' relationship with one of its most reliable allies in the Balkans. Berisha has been consistently pro-American throughout his career, working closely with multiple U.S. presidents and playing a crucial role in strengthening Albania's NATO partnership. The designation has alienated not only Berisha personally but also his substantial political following, which represents a portion of Albania's pro-Western political constituency.

The designation created lasting resentment among Albanian-Americans, who view it as an unjust attack on a leader who helped bring their homeland into the Western alliance. This damaged U.S. soft power and credibility within a diaspora community that has been traditionally supportive of American foreign policy.

Emboldening of Leftist and Socialist Regimes

By targeting a center-right, pro-Western leader while ignoring clear evidence of corruption and authoritarianism from the socialist government, the designation has sent a dangerous signal to leftist regimes throughout the region. It has demonstrated that the Biden administration would protect ideologically aligned governments regardless of their behavior, while punishing pro-American opposition figures.

This has emboldened other socialist and leftist leaders in the Balkans and Eastern Europe, who now understand that maintaining good relations with progressive networks in Washington can provide protection from U.S. oversight, even when engaging in corrupt or authoritarian practices.

Albania's Deterioration into Instability and Autocracy

The designation has directly contributed to Albania's transformation from a promising democracy into an increasingly autocratic state. By removing the threat of U.S. pressure on the ruling Socialist Party, the designation eliminated a key check on Prime Minister Rama's authoritarian tendencies.

⁵⁵ Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/.

⁵⁶ Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/.

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Transformation into a "Narco-State"

Under Prime Minister Edi Rama's leadership, Albania has been transformed from "one of the most promising economies in the Balkans into a narco-state."⁵⁷ Rama has "made Albania into a hub for the cocaine and opium trade from Turkey into Europe,"⁵⁸ and "Rama's decision to legalize marijuana cultivation has upended Albanian agriculture. Albanians today speak openly about the 'Marijuanization' of their economy."⁵⁹

Importantly, Rama is known to have indirect ties to Mexican drug cartels that threaten U.S. national security. On October 4, 2020 he hosted in his office Luftar Hysa, one of four Albanian brothers accused by Mexican media outlet El Universal of ties to Sinaloa Cartel leader Ismael "El Mayo" Zambada Garcia. The Hysa brothers are alleged to launder cartel money through casinos and businesses in Mexico and investments in Albania's tourism and gambling sectors. The October 2020 meeting in Rama's office was also attended by Besnik Lulaj, owner of the Marina Bay casino in the resort city of Vlore, Albania.⁶⁰

Corruption and Money Laundering

Albania's "real estate development has become the focal point for money laundering as Albanian leaders spend \$800 million on some developments but claim to spend five times that amount."⁶¹ The Albanian real estate market "is both booming and has become the wild west."⁶²

Systematic Electoral Violations

The May 2025 elections were "marred by systemic violations that compromised very seriously the international principles of elections process"⁶³ and "failed to provide a fair and free environment for voters to make informed choices."⁶⁴

⁵⁷ Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/.

⁵⁸ Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/.

⁵⁹ Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/.

⁶⁰ "The Two Videos: Who Lied About the Meeting with Prime Minister Edi Rama, Luftar Hysa or Both?" Alfa Press, 4 June 2024, alfapress.al/english/politike/dy-videot-kush-genjen-per-takimin-ne-kryeministri-edi-rama-apo-luftar-h-i111767?utm_source=chatgpt.com.

⁶¹ Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, <https://www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/>.

⁶² Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, <https://www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/>.

⁶³ "Informational Materials: Preliminary Report for the International Community on the 11 May 2025 Parliamentary Elections in Albania." Continental Strategy, 16 May 2025, [https://shqiptarja.com/uploads/ckeditor/682d9b7e55ef97545-Informational-Materials-20250516-9_watermark%20\(2\).pdf](https://shqiptarja.com/uploads/ckeditor/682d9b7e55ef97545-Informational-Materials-20250516-9_watermark%20(2).pdf).

⁶⁴ "Informational Materials: Preliminary Report for the International Community on the 11 May 2025 Parliamentary Elections in Albania." Continental Strategy, 16 May 2025, [https://shqiptarja.com/uploads/ckeditor/682d9b7e55ef97545-Informational-Materials-20250516-9_watermark%20\(2\).pdf](https://shqiptarja.com/uploads/ckeditor/682d9b7e55ef97545-Informational-Materials-20250516-9_watermark%20(2).pdf).

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The ruling Socialist Party engaged in "weaponizing the justice system against the opposition"⁶⁵ with "politically motivated court trials, arrests, and the imprisonment of opposition leaders."⁶⁶

Criminal Infiltration

Criminal organizations directly controlled the electoral process, with "elections in 10 out of 12 Albania's electoral districts and 21 out of 61 municipalities overtaken by the country's most dangerous criminal gangs."⁶⁷ These "criminal networks operated under direct coordination from the Prime Minister's Office."⁶⁸

International observers documented "links between political parties and organized crime in some areas, with organized crime groups intimidating and threatening voters and, at times, candidates."⁶⁹

State Capture

The OSCE/ODIHR report confirmed that "the ruling party benefitted from the widespread use of administrative resources and institutional leverage"⁷⁰ and that "the playing field was uneven,"⁷¹ with systematic "pressure on public employees, cases of intimidation of opposition supporters and the misuse of patronage networks."⁷²

Regional Security Implications

Albania's deterioration has broader implications for regional stability. The country's transformation into a narco-state threatens the security of NATO allies and EU partners. Criminal networks operating from Albania now pose a direct threat to European security, while the country's democratic backsliding undermines the credibility of Western institutions in the region.

The designation achieved the opposite of its stated goals: instead of promoting accountability and democratic governance, it has enabled the rise of an increasingly

⁶⁵ International Democratic Union. Resolution on Albania. IDU Executive Meeting, 6 Dec. 2024, Washington, D.C., https://www.idu.org/wp-content/uploads/2024/12/Resolution_on_Albania_IDU_Executive_Meeting_in_Washington_DC_December_FINAL2.pdf.

⁶⁶ International Democratic Union. Resolution on Albania. IDU Executive Meeting, 6 Dec. 2024, Washington, D.C., https://www.idu.org/wp-content/uploads/2024/12/Resolution_on_Albania_IDU_Executive_Meeting_in_Washington_DC_December_FINAL2.pdf.

⁶⁷ Berisha, Sali. "Bandat vepruan në 10 qarqe për të sjellë në parlament 30 kandidatë socialistë." Vox News, 14 May 2025, <https://www.voxnews.al/english/politike/berisha-bandat-vepruan-ne-10-qarqe-per-te-sjelle-ne-parlament-30-kandid-i91952>.

⁶⁸ Berisha, Sali. "Bandat vepruan në 10 qarqe për të sjellë në parlament 30 kandidatë socialistë." Vox News, 14 May 2025, <https://www.voxnews.al/english/politike/berisha-bandat-vepruan-ne-10-qarqe-per-te-sjelle-ne-parlament-30-kandid-i91952>.

⁶⁹ "International Observers: Elections in Albania Marred by Abuse of Power and Voter Intimidation." Ditari Politik, 19 May 2025, <https://www.ditari.al/english/ditari-politik/vezhguesit-nderkombetare-zgjedhjet-ne-shqiperi-te-cenuara-nga-abu-i532184>.

⁷⁰ "Albania's Parliamentary Elections Competitive and Well Run but Lacked Level Playing Field, International Observers Say." OSCE Office for Democratic Institutions and Human Rights, 12 May 2025, <https://www.osce.org/odihr/elections/590610>.

⁷¹ "Albania's Parliamentary Elections Competitive and Well Run but Lacked Level Playing Field, International Observers Say." OSCE Office for Democratic Institutions and Human Rights, 12 May 2025, <https://www.osce.org/odihr/elections/590610>.

⁷² "Albania's Parliamentary Elections Competitive and Well Run but Lacked Level Playing Field, International Observers Say." OSCE Office for Democratic Institutions and Human Rights, 12 May 2025, <https://www.osce.org/odihr/elections/590610>.

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authoritarian and corrupt regime that threatens both Albanian democracy and regional security interests.

3. HISTORICAL DEMOCRATIC CREDENTIALS

Historical Democratic Credentials

Berisha led Albania's transition from communist dictatorship to democracy, founding "the Democratic Party of Albania, an unabashedly center-right party."⁷³ He "privatized both land and homes [reduced] inflation to the single digits...[and]...allowed religion to again flourish after decades of Communist repression."⁷⁴

Crucially, when his party lost elections in 1997, "Berisha gracefully transitioned into leader of the opposition," demonstrating his commitment to democratic norms.⁷⁵

Berisha remains the popular leader of the main opposition party in Albania and returning the United States to a neutral role in Albania's internal political affairs will be difficult so long as the designation remains.

4. LIFTING THE DESIGNATION WOULD RESTORE POLICY NEUTRALITY

Current Policy Imbalance

The current approach represents dangerous partisanship where "the State Department uses dirty tricks to put its finger on the scale,"⁷⁶ betraying democracy by picking sides.

Compelling National Interest

The case for removal is "strong for reasons that are self-evident: He is a staunch American ally whose inclusion on the list was entirely politically motivated by the previous administration. The imminent Albanian election and the need for President Berisha to campaign among the Albanian-American diaspora form a 'compelling national interest' that warrants quick, decisive action by the Secretary."⁷⁷

5. CONSISTENCY WITH SECRETARY RUBIO'S STATED POSITIONS AND TRUMP ADMINISTRATION REFORMS

Opposition to Politicized Sanctions

⁷³ Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, <https://www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/>.

⁷⁴ Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, <https://www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/>.

⁷⁵ Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, <https://www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/>.

⁷⁶ Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, <https://www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/>.

⁷⁷ "Informational Materials: Preliminary Report for the International Community on the 11 May 2025 Parliamentary Elections in Albania." Continental Strategy, 8 May 2025, <https://efile.fara.gov/docs/7545-Informational-Materials-20250508-7.pdf>.

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As a Senator, Marco Rubio was among eight senators who criticized the Biden administration's "misuse of authorities provided by Congress to combat corruption" and expressed concern about the "politicized sanctions process."⁷⁸ They specifically noted that the administration had "ignored well-documented cases of significant corruption by foreign government officials actively undermining U.S. national security interests and supporting U.S. adversaries."⁷⁹

Policy experts have noted that "Blinken's sanctions against Berisha were as politically driven and mendacious as his lifting of sanctions against the Houthis,"⁸⁰ and that "Secretary of State Marco Rubio should recognize that Rama's goals in throwing legal challenges at Berisha have less to do with clean government and more with delivering a knock-out blow to the 80-year-old Berisha."⁸¹

Alignment with Trump Administration Anti-Lawfare Agenda

Lifting the Berisha designation would be consistent with President Trump's stated goal of reversing the weaponization of government institutions that occurred under his predecessor. The designation represents a clear example of how foreign policy tools were used to advance ideological objectives rather than legitimate anti-corruption efforts.

Breaking State Department-NGO Collusion

The Berisha case exemplifies the problematic relationship between left-leaning career State Department bureaucrats and progressive NGOs that Secretary Rubio committed to reforming. The close connections between Rama and the Soros network, including Rama's attendance at Alex Soros's wedding, illustrate how these relationships can compromise objective policymaking.

Secretary Rubio's reform agenda includes breaking this collusion and ensuring that foreign policy decisions are based on American national interests rather than the preferences of progressive advocacy networks. Lifting the Berisha designation would send a clear signal that the State Department will no longer serve as an instrument for advancing partisan political agendas abroad.

KEY SUPPORTING EVIDENCE

European Parliament Condemns Albanian Government's Authoritarian Drift

⁷⁸ "Republican Senators Cite Latin American Support of Israel, Slamming White House Sanctions." JNS.org, 26 Feb. 2024, <https://www.jns.org/republican-senators-cite-latin-american-support-of-israel-slamming-white-house-sanctions/>.

⁷⁹ "Republican Senators Cite Latin American Support of Israel, Slamming White House Sanctions." JNS.org, 26 Feb. 2024, <https://www.jns.org/republican-senators-cite-latin-american-support-of-israel-slamming-white-house-sanctions/>.

⁸⁰ Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, <https://www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/>.

⁸¹ Rubin, Michael. "How the State Department Pushed Albania from Democracy to Narco-State." American Enterprise Institute, 17 Apr. 2025, <https://www.aei.org/op-eds/how-the-state-department-pushed-albania-from-democracy-to-narco-state/>.

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The European Parliament's July 2025 resolution on Albania provides damning evidence of the country's democratic deterioration under the current government. The resolution, adopted by 438 Members of the European Parliament, "strongly regrets that the political climate remains highly polarised," warns of the "lack of independence of key democratic institutions," and "expresses concern about the continued vulnerability of state institutions to undue influence."⁴⁵

European parliamentarians documented systematic abuse by the ruling party:

- **Judicial Manipulation:** MEP Frédéric Beleri, himself imprisoned during the campaign, condemned "the much-discussed judicial reform has failed due to the constant interference of the Albanian government... Observers from the OSCE and the EU point to political pressure on voters, manipulation of the media, interference of organized crime in the electoral process, and suspicious sources of funding."⁴⁶
- **Criminal-State Nexus:** MEP Alexander Sell issued a stark warning: "The Albanian mafia controls the cocaine and marijuana trade in Europe with extreme brutality... Experts call Albania the Colombia of Europe."⁴⁷
- **Systematic Corruption:** MEP Aleksandar Nikolic questioned continued EU support: "Since 2007, over €2 billion have been given to Albania. And for what result? The country remains plagued by corruption, its press is gagged, and it is a hub for organized crime."⁴⁸

The resolution highlights "limited progress in the fight against corruption and organised crime," including "the presence of criminal actors in key sectors of the economy" and criticizes "shortcomings related to voter pressure, vote-buying, and misuse of state resources."⁴⁹

OSCE/ODIHR Findings on Electoral Violations

The international election observation mission found numerous serious violations:

- **Intimidation and Pressure:** "Candidates were generally able to campaign freely although some reported facing intimidation" and "there were numerous allegations of pressure on voters, especially public employees."⁸²
- **State-Party Fusion:** "The wide use of such public activities for electoral purposes further reinforced the ruling party's undue advantage, and blurred the

⁸²"STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS." www.Oscepa.Org, www.oscepa.org/en/documents/election-observation/election-observation-statements/albania/statements/5217-2025-parliamentary/file.

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line between the state and party, contrary to paragraph 5.4 of the 1990 OSCE Copenhagen Document."⁸³

- **Criminal Influence:** "Links between political parties and organized crime in some areas, with organized crime groups intimidating and threatening voters and, at times, candidates."⁸⁴
- **Media Control:** "Concentration of media ownership undermining the plurality of news sources, along with self-censorship among journalists."⁸⁵

Congressional Oversight

Republican Senators, including current Secretary of State Marco Rubio, formally expressed concerns about the politicization of 7031(c) designations, writing: "We are deeply troubled by why your administration appears to have politicized the sanctions process to target certain U.S. partners and undermine U.S. national and regional security while refusing to sanction egregious actions in the region by others."⁸⁶

Growing International Concern About Albanian Democracy

The European Parliament's resolution reflects "growing fatigue with symbolic reforms and worsening trust in Albania's democratic credibility."⁸⁷ As French MEP Angéline Furet stated: "Let's stop funding the illusion. Let's stop funding corruption and contempt for democracy. Before enlargement, let's demand transparency and results."⁸⁸

The resolution warns of "backsliding in fundamental rights and rule of law" and urges the government to "depoliticise public institutions" and "foster a democratic political

⁸³"STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS." Www.Oscepa.Org, www.oscepa.org/en/documents/election-observation/election-observation-statements/albania/statements/5217-2025-parliamentary/file.

⁸⁴"STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS." Www.Oscepa.Org, www.oscepa.org/en/documents/election-observation/election-observation-statements/albania/statements/5217-2025-parliamentary/file.

⁸⁵"STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS." Www.Oscepa.Org, www.oscepa.org/en/documents/election-observation/election-observation-statements/albania/statements/5217-2025-parliamentary/file.

⁸⁶ Rubio, Marco, et al. "United States Senate." Received by Joe Biden, 20 Feb. 2024, Washington DC, Washington DC.

⁸⁷ "European Parliament Resolution of 12 July 2023 on the 2022 Commission Report on Albania." Europarl.Europa.Eu, www.europarl.europa.eu/doceo/document/TA-9-2023-0285_EN.html. Accessed 22 July 2025.

⁸⁸ "European Parliament Resolution of 12 July 2023 on the 2022 Commission Report on Albania." Europarl.Europa.Eu, www.europarl.europa.eu/doceo/document/TA-9-2023-0285_EN.html. Accessed 22 July 2025.

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culture."⁸⁹ It specifically references "systemic rights violations" and calls for respect for minority rights, noting that "many unresolved property claims remain."⁹⁰

Evidence of Corruption Under Current Leadership

Multiple sources document how corruption has worsened under Prime Minister Rama:

- **Vote Buying:** "The government distributed €100 bonuses to approximately 760,000 pensioners, totaling over €70 million from the state budget - a blatant misuse of state funds for electoral purposes."⁹¹
- **Patronage Networks:** "Each Public servant had the obligation to ensure 20 votes in the country and diaspora and present the contact numbers of those voters as well the picture of the vote on the day of the election."⁹²
- **Criminal Coordination:** "The criminal networks operated under direct coordination from the Prime Minister's Office, with Ergys Agasi, one of Rama's closest confidants, acting as the national coordinator of these criminal structures."⁹³

RECOMMENDATION

The Secretary of State should immediately lift the 7031(c) designation of Sali Berisha based on:

1. **Lack of factual basis:** The designation was politically motivated without substantial evidence
2. **Changed circumstances:** Albania's democratic deterioration under current leadership demonstrates the designation's counterproductive effects

⁸⁹ "European Parliament Resolution of 12 July 2023 on the 2022 Commission Report on Albania." Europarl.Europa.Eu, www.europarl.europa.eu/doceo/document/TA-9-2023-0285_EN.html. Accessed 22 July 2025.

⁹⁰ "European Parliament Resolution of 12 July 2023 on the 2022 Commission Report on Albania." Europarl.Europa.Eu, www.europarl.europa.eu/doceo/document/TA-9-2023-0285_EN.html. Accessed 22 July 2025.

⁹¹ "Preliminary Report." *Partia Demokratike*, shqiptarja.com/uploads/ckeditor/682d9b7e55ef97545-Informational-Materials-20250516-9_watermark%20%282%29.pdf?

⁹² "Preliminary Report." *Partia Demokratike*, shqiptarja.com/uploads/ckeditor/682d9b7e55ef97545-Informational-Materials-20250516-9_watermark%20%282%29.pdf?

⁹³ "Preliminary Report." *Partia Demokratike*, shqiptarja.com/uploads/ckeditor/682d9b7e55ef97545-Informational-Materials-20250516-9_watermark%20%282%29.pdf?

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3. **Compelling national interest:** Restoring U.S. credibility and neutrality in Albanian politics serves strategic interests
4. **Consistency with policy principles:** Aligns with Secretary Rubio's stated opposition to politicized sanctions
5. **Trump administration reform agenda:** Supports efforts to reverse weaponization of government institutions
6. **Breaking State Department-NGO collusion:** Demonstrates commitment to objective policymaking free from progressive advocacy network influence

As the legal memorandum concludes, "His only remaining means of redress lie with the Secretary,"⁹⁴ making this decision both legally straightforward and strategically imperative.

The designation has failed to achieve its stated anti-corruption goals while actively harming U.S. interests and Albania's democratic development. More troubling, it appears to have been influenced by ideological considerations, personal relationships between Albanian leadership, and progressive networks rather than objective assessment of evidence.

As a Biden administration official has acknowledged, the designation was based on "rumors" rather than concrete evidence, and the system itself has "many flaws." Meanwhile, the European Parliament has documented Albania's systematic transformation into an increasingly authoritarian state under the current government—the very outcome the designation was supposed to prevent.⁹⁵

Lifting the designation would represent a return to principled, neutral foreign policy that serves America's long-term strategic interests in the Balkans while demonstrating the Trump administration's commitment to ending the weaponization of government institutions for partisan purposes.

This briefing is based on extensive documentation from OSCE/ODIHR election observation reports, U.S. Congressional correspondence, policy analysis from the American Enterprise Institute, legal documentation regarding Section 7031(c) procedures, European Parliament resolutions and debates, Congressional Research Service analysis, and interviews with former U.S. diplomatic officials.

⁹⁴ Gaver, Craig. Received by Alberto Martinez, *Continental PLLC*, 1 May 2025, efile.fara.gov/docs/7545-Informational-Materials-20250508-7.pdf?

⁹⁵ "European Parliament Adopts Report on Albania: Competitive but Polarized Elections." Vox News, 4 June 2025, <https://www.voxnews.al/english/politike/parlamenti-europian-miraton-raporton-per-shqiperine-zgjedhje-konkurruet-i93377>.

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Appendix:

8 U.S.C. § 1182 n. Inadmissibility of Foreign Officials and Family Members Involved in Kleptocracy or Human Rights Violations

Pub. L. 118–47, div. F, title VII, §7031(c), Mar. 23, 2024, 138 Stat. 784, provided that:

"(1) Ineligibility.-

"(A) Officials of foreign governments and their immediate family members about whom the Secretary of State has credible information have been involved, directly or indirectly, in significant corruption, including corruption related to the extraction of natural resources, or a gross violation of human rights, including the wrongful detention of locally employed staff of a United States diplomatic mission or a United States citizen or national, shall be ineligible for entry into the United States.

"(B) Concurrent with the application of subparagraph (A), the Secretary shall, as appropriate, refer the matter to the Office of Foreign Assets Control, Department of the Treasury, to determine whether to apply sanctions authorities in accordance with United States law to block the transfer of property and interests in property, and all financial transactions, in the United States involving any person described in such subparagraph.

"(C) The Secretary shall also publicly or privately designate or identify the officials of foreign governments and their immediate family members about whom the Secretary has such credible information without regard to whether the individual has applied for a visa.

"(2) Exception.-Individuals shall not be ineligible for entry into the United States pursuant to paragraph (1) if such entry would further important United States law enforcement objectives or is necessary to permit the United States to fulfill its obligations under the United Nations Headquarters Agreement: *Provided*, That nothing in paragraph (1) shall be construed to derogate from United States Government obligations under applicable international agreements.

"(3) Waiver.-The Secretary may waive the application of paragraph (1) if the Secretary determines that the waiver would serve a compelling national interest or that the circumstances which caused the individual to be ineligible have changed sufficiently.

"(4) Report.-Not later than 30 days after the date of enactment of this Act [Mar. 23, 2024], and every 90 days thereafter until September 30, 2025, the Secretary of State shall submit a report, including a classified annex if necessary, to the appropriate congressional committees [Committees on Appropriations and Foreign Relations of the Senate and the Committees on Appropriations and Foreign Affairs of the House of Representatives] and the Committees on the Judiciary describing the information related to corruption or violation of human rights concerning each of the individuals found ineligible in the previous 12 months pursuant to

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paragraph (1)(A) as well as the individuals who the Secretary designated or identified pursuant to paragraph (1)(B), or who would be ineligible but for the application of paragraph (2), a list of any waivers provided under paragraph (3), and the justification for each waiver.

"(5) Posting of report.-Any unclassified portion of the report required under paragraph (4) shall be posted on the Department of State website.

"(6) Clarification.-For purposes of paragraphs (1), (4), and (5), the records of the Department of State and of diplomatic and consular offices of the United States pertaining to the issuance or refusal of visas or permits to enter the United States shall not be considered confidential."

Similar provisions were contained in the following prior acts:

Pub. L. 117-328, div. K, title VII, §7031(c), Dec. 29, 2022, 136 Stat. 5026 .

Pub. L. 117-103, div. K, title VII, §7031(c), Mar. 15, 2022, 136 Stat. 615 .

Pub. L. 116-260, div. K, title VII, §7031(c), Dec. 27, 2020, 134 Stat. 1743 .

Pub. L. 116-94, div. G, title VII, §7031(c), Dec. 20, 2019, 133 Stat. 2865 .

Pub. L. 116-6, div. F, title VII, §7031(c), Feb. 15, 2019, 133 Stat. 319 .

Pub. L. 115-141, div. K, title VII, §7031(c), Mar. 23, 2018, 132 Stat. 884 .

Pub. L. 115-31, div. J, title VII, §7031(c), May 5, 2017, 131 Stat. 640 .

Pub. L. 114-113, div. K, title VII, §7031(c), Dec. 18, 2015, 129 Stat. 2755 .

Pub. L. 113-235, div. J, title VII, §7031(c), Dec. 16, 2014, 128 Stat. 2620 .

Pub. L. 113-76, div. K, title VII, §7031(c), Jan. 17, 2014, 128 Stat. 511 .

Pub. L. 112-74, div. I, title VII, §7031(c), Dec. 23, 2011, 125 Stat. 1211 .

Pub. L. 111-117, div. F, title VII, §7084, Dec. 16, 2009, 123 Stat. 3400 .

Pub. L. 111-8, div. H, title VII, §7086, Mar. 11, 2009, 123 Stat. 912 .

Pub. L. 110-161, div. J, title VI, §699L, Dec. 26, 2007, 121 Stat. 2373 .

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