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ORGANIZED CRIME

BEYOND THE BLACKLIST

HOW EFFECTIVE
ARE SANCTIONS IN
THE WESTERN BALKANS?

RUGGERO SCATURRO | SAŠA ĐORĐEVIĆ

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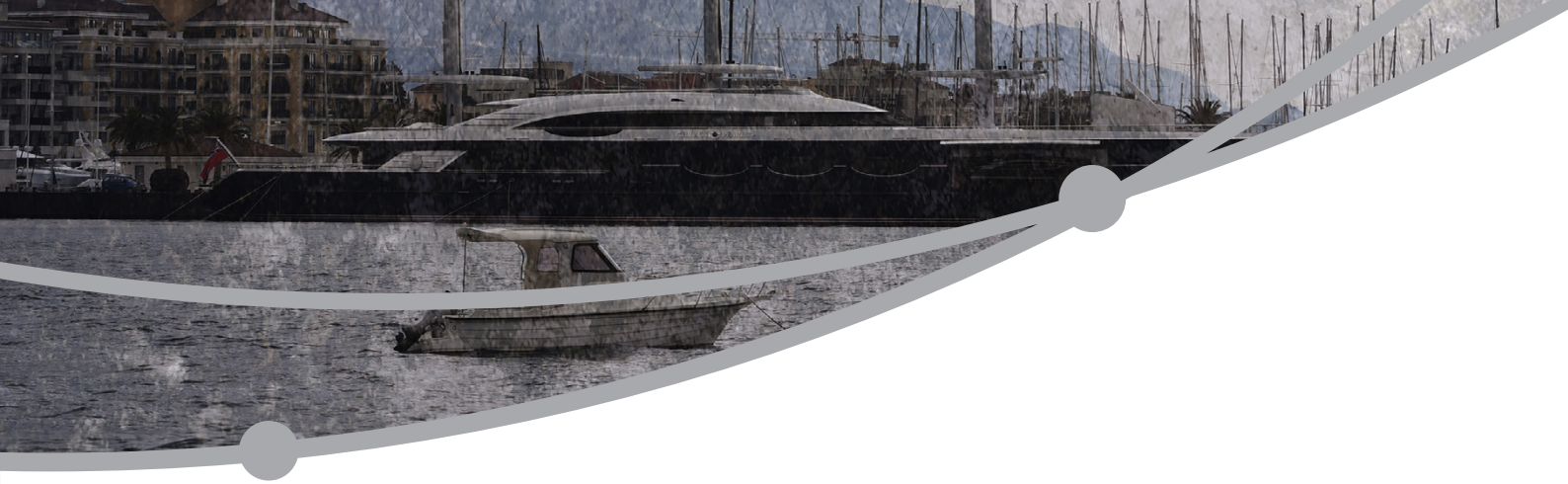
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CONTENTS

- Summary1**
 - Key findings..... 2
- Introduction3**
 - Methodology..... 5
- Strategic adaptation to sanctions.....6**
 - Economic evasion strategies..... 6
 - Political evasion strategies 11
- Conclusion.....17**
 - Recommendations 17
- Notes..... 19



SUMMARY

Targeted sanctions, ranging from travel bans and financial restrictions to trade limits and asset freezes, are intended to isolate powerful individuals and legal entities by diminishing their access to political and economic resources. From 2017 to 2025, sanctioning entities, including the US, the UK and international organizations such as the UN and the EU, designated over 150 individuals and businesses from the Western Balkans due to suspicions of organized crime, corruption and regional destabilization. However, as this policy brief shows, sanctioned actors in the Western Balkans have, in practice, developed sophisticated strategies to blunt, bypass and even exploit these measures.

Drawing on original fieldwork, interviews and open-source intelligence, this policy brief provides a comparative assessment of how sanctioned individuals adapt. The research reveals that rather than retreating from public life, many figures reposition themselves through two dominant forms of evasion: economic manoeuvres and political shielding. These strategies exploit legal loopholes, institutional weaknesses and geopolitical shifts in order to maintain power and profitability. The analysis centres on seven case studies – Sali Berisha (Albania), Tom Doshi (Albania), Milorad Dodik (Bosnia and Herzegovina), the North Kosovo Group (Kosovo), Svetozar Marović (Montenegro), Nikola Gruevski (North Macedonia) and Slobodan Tešić (Serbia) – to illustrate how economic and political evasion and mitigation methods operate in practice.

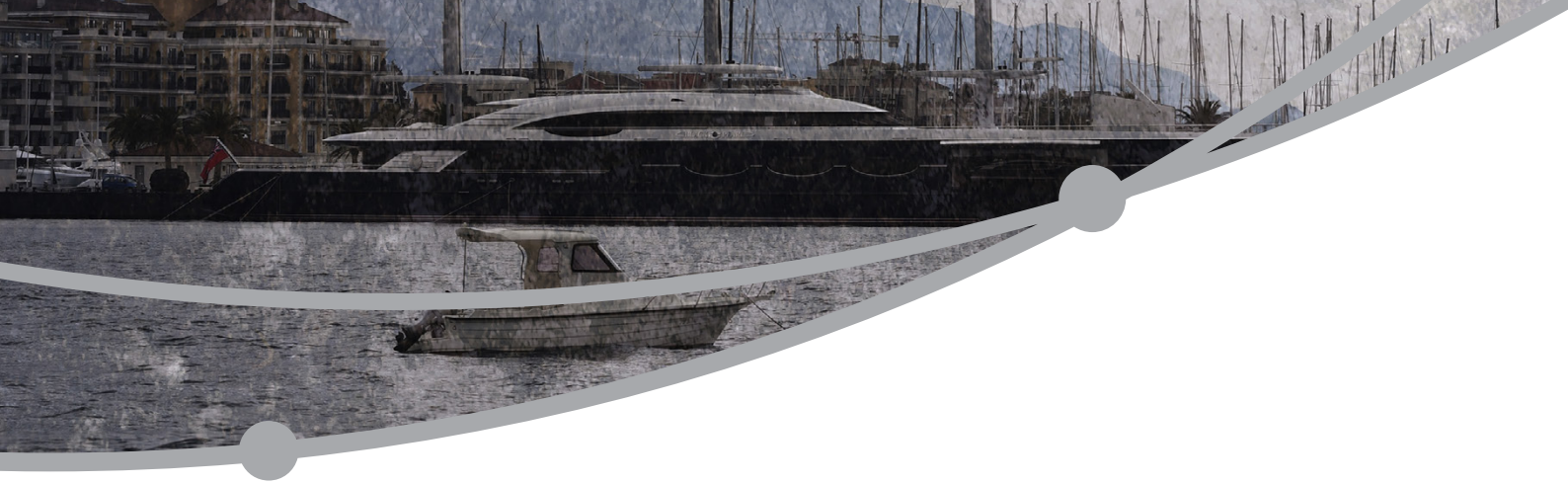
This brief also highlights more informal pathways of influence. For instance, a figure such as Svetozar Marović, the former president of Serbia and Montenegro, has been subject to longstanding legal constraints due to his corruption conviction in 2016¹ and the sanctions imposed on him in 2022.² However, he has also benefited from soft protection mechanisms, such as support from religious networks and a shift to a more favourable political setting. Such cases demonstrate how impunity is sustained through political complicity, weak oversight and the selective enforcement of legal norms.

Essentially, sanctions alone are insufficient. Sanctions by countries like the US and the UK often have limited reach, both geographically and legally. While they can harm the reputation of targeted individuals and companies worldwide, they may also disrupt business operations, especially if local firms have financial ties to US- or UK-based entities – those partners might sever connections to avoid secondary risks. But the legal impact usually stays within the borders of the issuing country. The effectiveness of these sanctions mainly depends on whether local law enforcement or regulators, where the targeted entities operate, investigate for organized crime or corruption suspicions. Without active local enforcement, sanctions risk being more symbolic than effective. Therefore, policy responses should be firmer and more integrated,³ and actions against designated persons must form

part of broader accountability ecosystems. This could include supporting investigative journalism and civil society, strengthening financial intelligence capacities, encouraging regional enforcement cooperation and reforming public procurement systems.

Key findings

- Designated individuals in the Western Balkans typically employ a combination of economic strategies and political protection to evade or mitigate sanctions.
- Sanctioned actors in the Western Balkans circumvent restrictions through proxies and cross-border assets.
- Sanctions often reinforce power, prompting adaptation rather than compliance.
- Economic evasion includes asset transfers to relatives and proxies.
- Political evasion involves nationalist framing, hijacking narratives from organized crime and corruption to politics, and informal influence networks.
- Sanctions alone are insufficient without stronger state and non-state oversight, transparency and regional enforcement.



INTRODUCTION

Over the past decade, targeted sanctions have emerged as a strategic instrument in national foreign policies and the efforts of the international community to combat organized crime and systemic corruption in the Western Balkans.⁴ These measures are designed to freeze assets, restrict travel and limit access to financial systems. They also signal censure. Sanctions are frequently applied in response to patterns of illicit enrichment, political capture and destabilizing behaviour by influential actors.

YEAR	GROUNDS FOR SANCTIONING					ISSUING ENTITY		TOTAL
	Corruption	Destabilization	Corruption and destabilization	Organized crime	Organized crime and corruption	US	UK	
2017	0	0	0	0	1	1	0	1
2018	3	0	0	0	0	3	0	3
2019	1	0	0	0	16	17	0	17
2020	1	1	0	0	0	2	0	2
2021	1	1	0	1	46	49	0	49
2022	8	8	6	0	2	19	5	24
2023	20	8	3	1	1	33	0	33
2024	5	6	11	0	0	20	2	22
2025	0	1	0	0	0	1	0	1
Total	39	25	20	2	66	145	7	152

FIGURE 1 Total number of designations (individual and business) issued by the US and the UK on selected grounds (2017–May 2025).
 SOURCE: <https://see.globalinitiative.net/sanctions-database/>

According to recent analysis by the Global Initiative Against Transnational Organized Crime (GI-TOC), the rationale behind sanctions can be summarized as follows: to coerce behavioural change among designated actors, to constrain operational and financial capabilities, and to symbolically assert the norms of international accountability.⁵ In practice, however, the outcome can vary considerably. The effectiveness of sanctions depends on the issuing entities' leverage over the institutions of the

receiving country, the cohesion of international enforcement and the designated individuals' capacity to adapt. In countries like Bosnia and Herzegovina and Serbia, for example, where institutional integrity is often compromised, public procurement processes are opaque and political elites are frequently entangled in economic ventures, sanctions can be circumvented or, in some cases, weaponized for political purposes.⁶

The case studies presented in this brief provide a comparative analysis of how sanctioned individuals and their networks respond to their designations. This research paper is not intended to express any opinion on the guilt or innocence of the targeted persons or entities, but only to assess the responses of those who have been sanctioned.

The research suggests that, far from being passive targets, these actors regularly demonstrate a high degree of resilience and adaptability.⁷ They restructure ownership chains, transfer assets to proxies and utilize domestic political capital to shield themselves from meaningful enforcement of sanctions. In some cases, they pursue reputational rehabilitation through legal actions abroad and legislative manoeuvres at home – strategies that have proven effective in maintaining access to power and resources despite attempts at formal isolation. A core focus of this brief, therefore, is to outline the economic and political strategies employed by sanctioned individuals from the Western Balkans to blunt the impact of restrictions.

The first key method of evading sanctions involves economic manoeuvres such as proxy ownership, cross-jurisdictional diversification and company rebranding. These allow designated actors to continue accessing public procurement and financial markets. In Serbia, firms with ties to the networks of sanctioned individuals and businesses based in the Serb-majority areas of northern Kosovo have been able to continue operating as lucrative contractors for state infrastructure projects, thanks to formal changes in ownership. Similarly, Slobodan Tešić, who has been subject to international sanctions for arms dealing for decades,⁸ has leveraged his political connections, nominee shareholders and family members to obscure his control over his business interests. Investigative reporting suggests that companies linked to Tešić exported weapons to the UK in 2024,⁹ despite his being subject to sanctions in the US since December 2017 and in the UK between December 2022 and June 2025.¹⁰



The US Treasury. From 2017 to 2025, sanctioning entities designated over 150 individuals and businesses from the Western Balkans © Yuki Iwamura/Bloomberg via Getty Images

The second key method of circumventing sanctions – political shielding – complements these economic tactics. Actors in the Western Balkans frequently use legal actions and strong communication campaigns to challenge their designations. Notable examples include Sali Berisha, the Albanian opposition leader, and Milorad Dodik, the former president of Republika Srpska, one of the two entities within Bosnia and Herzegovina.¹¹ Both have pursued narrative control and policy influence through the ideological framing of sanctions as foreign interference. Legal challenges to sanctions also provide, in part, a platform through which such ideological framing is possible. These efforts aim to weaken international enforcement and reposition designated individuals as defenders of national sovereignty. Rather than serving as a deterrent, therefore, sanctions have in certain contexts been reframed as evidence of international persecution, thereby reinforcing domestic legitimacy.¹²

Moreover, this reframing is not merely rhetorical. Sanctioned individuals in the Western Balkans have actively worked to alter the legal and institutional environments in which they operate. These efforts include proposals to compel banks to service designated clients, amendments to labour laws, and the use of state structures to process salaries and manage assets outside traditional financial institutions. Such efforts, undertaken by or on behalf of sanctioned elites – often through high-cost international firms – reflects a strategic intent to undermine sanctions through diplomatic and legal channels.¹³

These responses reveal not only defiance, but also an escalating level of sophistication in how those accused of organized crime and political corruption interact with international accountability mechanisms. Sanctions disrupt, but they do not dismantle. Where enforcement is partial and political will is lacking, they are absorbed into the logic of informal governance – treated not as a terminal threat but as a challenge to be managed through adaptation and influence.

Ultimately, this brief argues that sanctions, while useful as a symbolic and financial constraint, must be embedded within a broader and more sustained strategy. This should entail reinforcing domestic oversight institutions, enhancing transparency in public contracting, supporting investigative journalism and civil society, and fostering regional cooperation on financial intelligence. Without these additional measures, sanctions risk becoming merely declaratory – highly visible, but with limited transformative impact.

Methodology

Drawing on the findings of a 2024 GI-TOC report on sanctions in the Western Balkans,¹⁴ this brief takes a mixed-methods approach, integrating qualitative and quantitative analyses to examine how individuals in the region respond to international sanctions imposed for corruption, organized crime and other grounds.

Through semi-structured interviews with subject-matter experts and an extensive review of open-source material – including investigative journalism, political finance disclosures, international assessments, statistical data and court proceedings – the research sheds light on the tactics used by designated individuals to circumvent sanctions and retain their access to economic and political power.



STRATEGIC ADAPTATION TO SANCTIONS

Sanctions are designed to disrupt the financial and political ecosystems that allow corruption and organized crime to flourish. However, their actual impact depends not only on how they are imposed, but on how those targeted respond. In the Western Balkans, designated individuals and their networks have developed adaptive mechanisms that enable them to mitigate and bypass sanctions, or even exploit them for their own benefit.

Based on the GI-TOC's recent research into the effects of sanctions on designated persons and entities, this report has identified two main forms of evasion: economic and political.¹⁵ Although these strategies often overlap in practice, distinguishing between them analytically provides a clearer insight into how sanctioned actors adapt, while also revealing the structural limitations of sanctions as a standalone tool.

Economic evasion strategies

The economic dimension concerns the practical efforts made to preserve wealth, sustain business operations and maintain access to public resources. These tactics include transferring assets to proxies, establishing new legal entities, participating in procurement schemes through rebranded companies and leveraging informal or state-tolerated markets. In Serbia, these dynamics are especially visible in the continued profitability of sanctioned companies linked to sanctioned individuals – despite formal ownership changes – highlighting the limitations of enforcement in contexts where political protection is available. The three case studies below illustrate how designated individuals in the Western Balkans have evaded sanctions through what appear to be proxy share transfers and cross-jurisdictional diversification.

The North Kosovo Group

Despite its members being subject to targeted US and UK sanctions, the North Kosovo Group's¹⁶ financial and operational footprint remains largely intact.¹⁷ This is not due to a failure to list individuals or entities, but rather to the sophisticated methods used to circumvent the effects of these restrictions. Two particularly potent financial engineering tactics stand out: the transfer of shares to trusted proxies and the diversification of ownership structures across jurisdictions. These strategies have preserved the group's influence, secured public funds and insulated key actors from accountability.

Following the Global Magnitsky sanctions issued by the US Treasury in December 2021, and subsequent designations by the UK in 2022, some members of the North Kosovo Group undertook a rapid and

calculated restructuring of their business portfolios. One example is Milan Radoičić, who was sanctioned due to organized crime allegations.¹⁸ Although the formal sanctions were introduced earlier, it was only after publicly claiming responsibility for an armed attack on a police patrol in Banjska village in North Kosovo in September 2023¹⁹ that Radoičić formally exited several companies in which he held shares. These included Inkop,²⁰ one of Serbia's major road construction firms, its subsidiaries Novi Pazar-Put²¹ and Betonjerka,²² and the hospitality business Dolly Bell.²³ He also formally transferred the ownership of Inkop to the brothers Zvonko and Žarko Veselinović, who are also on the sanctions list but less prominent in the national media.²⁴ This indicates that the restructuring did not happen instantly in response to the sanctions. Instead, it was a delayed reaction triggered by mounting international pressure and growing domestic scrutiny in Kosovo and Serbia after the Banjska armed clash.²⁵

These companies, which are heavily involved in infrastructure works, continue to win public procurement contracts in Serbia.²⁶ Additionally, media reporting indicated a change in Radoičić's property ownership structure, with his name removed and only his wife's name remaining.²⁷ The changes in ownership maintained the companies' eligibility for this lucrative avenue of business, underlining the ineffectiveness of sanctions outside the territories of the entities that issued them. In essence, despite their formal designations, these firms remain under the control of sanctioned individuals, demonstrating that being sanctioned poses little obstacle, provided one stays out of the public spotlight.

Sanctions imposed unilaterally by countries like the US or the UK often have limited impact, as they are rarely enforced beyond the issuing state's borders. While designated individuals are barred from operating within these countries, they frequently continue to do so elsewhere, particularly in jurisdictions where they have support, and where enforcement is weak or political alignment with the issuing state is low. Unless sanctions are integrated into domestic law, they carry little binding authority, rendering the system more symbolic than effective.

COMPANY	PROFIT IN SERBIAN DINARS		
	2022	2023	2024
Inkop	2.03 billion	1.99 billion	849 million
Novi Pazar-Put	761 million	667 million	423 million
Betonjerka	88 million	111 million	97 million
Dolly Bell	-82 million	-172 million	-140 million

FIGURE 2 Net profits/losses generated by selected companies controlled by the North Kosovo Group in 2022, 2023 and 2024.

SOURCE: Company Wall²⁸

Radule Stević, a member of the Northern Kosovo Group sanctioned in 2023,²⁹ provides an example of the use of family proxies. Following his designation, Stević appointed his daughter Irena as director of I&M Stil Zvečan, a company located at the same address as the firm Rad 028, which he owns and manages as director.³⁰ Analysis of public tenders from 2025 and 2024 reveals that I&M Stil Zvečan participated in various calls for public procurement, either alone or alongside Rad 028 as part of a two-company group. One contract from January 2024 draws specific attention: Rad 028 responded to an invitation to tender worth over 450 million Serbian dinars (€3.8 million) – together with I&M Stil Zvečan.³¹ The call, for construction at a local hospital, was published by the Temporary Authority of the Kosovska Mitrovica Municipality, a parallel institution supported financially and technically by Serbia, which operates alongside the Kosovar authority.³²

In this case, sanctions do not necessarily prevent designated individuals or private entities from operating in Serbia or the Serbian-majority areas of northern Kosovo. Currently, there are no legal or institutional barriers in Serbia that restrict sanctioned companies from continuing their operations. A similar situation exists in northern Kosovo, but under different conditions. The Serbian government continues to fund and support parallel institutions in Serb-majority areas in Kosovo, allowing entities such as Rad 028 to stay active. Furthermore, even Kosovo's authorities have accused Rad 028 of financing terrorism and seized some of their assets,³³ but this has not stopped its activities due to ongoing support from Serbia. In an interview with the GI-TOC, the Kosovo State Prosecution Office expressed concerns about the legitimacy of Kosovo Albanian businesses securing contracts from Rad 028.³⁴

Slobodan Tešić

The Russian invasion of Ukraine in February 2022 marked a pivotal moment for the global arms market, prompting a surge in the production of weapons and ammunition. Russia has transitioned into a war economy, reportedly surpassing NATO countries in artillery production.³⁵ Ukraine has also rapidly expanded its domestic defence industry, although it remains heavily reliant on Western military and financial support.³⁶ The context of war has created significant opportunities for sanctioned arms dealers to exploit. One such figure is Slobodan Tešić, a Serbian national and veteran of the international arms trade, who is currently subject to US and UK sanctions.³⁷

In order to sustain his operations and circumvent restrictions, Tešić has reportedly employed a familiar repertoire of obfuscation techniques.³⁸ These include the establishment of front companies, the use of nominee shareholders and the creation of complex ownership structures that mask his involvement.³⁹ Such strategies enable him to project a facade of legal detachment while retaining effective control. By leveraging these legal veils, which are often supported by personal and political networks, Tešić has maintained a foothold in international markets despite his designation.

In April 2024, the Serbian investigative news outlet KRIK reported that Tešić was exploiting his political connections to continue to profit from arms trading.⁴⁰ He was allegedly covertly controlling MMP Consulting, an arms trading firm formerly run by Milorad Pušica, a senior figure in the Serbian Progressive Party.⁴¹ Although Tešić was not officially listed as the owner or a representative, KRIK cited private correspondence and anonymous sources that revealed his de facto involvement.⁴² Tešić denied owning the company, claiming merely to be assisting friends with business dealings – a claim that was difficult to dispute in the absence of transparent ownership registries.⁴³

Further evidence of Tešić's ongoing involvement in the arms trade came to light in January 2025, when the Balkan Investigative Reporting Network reported that two companies he was associated with had exported weapons to the UK.⁴⁴ The first, Sofag, is formally registered in the name of Tešić's daughter, Jelena Petrović.⁴⁵ The second, Valir, is reportedly connected to individuals in Tešić's wider network.⁴⁶ The investigation also claimed that Sofag had facilitated the shipment of Serbian-manufactured rockets to Ukraine following the onset of the war in 2022.⁴⁷

Although Tešić is not officially listed as a representative of either firm, and the UK embassy in Serbia has confirmed that neither entity is currently under UK sanctions,⁴⁸ the information presented above suggests that he continues to exercise indirect control through familial and political proxies. This operational model would allow him to circumvent formal restrictions, raising serious concerns about the enforcement capacity of sanctioning regimes. Notably, Sofag reported an increase in annual profit of 549% in 2024, generating €1.66 million compared to €256 000 the previous year.⁴⁹ This sharp growth highlights the ongoing profitability of these ventures and the inadequacy of current monitoring and compliance mechanisms.

Milorad Dodik

Republika Srpska's former president, Milorad Dodik, and his family are another example of the evasion of sanctions through proxy ownership and corporate restructuring. Between 2017 and 2024, Dodik, his daughter Gorica, his son Igor and 10 associates were designated by the US for corruption and for obstructing the Dayton Peace Agreement.⁵⁰ The sanctions had a limited impact for the first few years. However, during a visit to Bosnia and Herzegovina in March 2024, the US Treasury's acting assistant secretary for terrorist financing publicly warned commercial banks to sever ties with designated individuals.⁵¹ In 2025, Germany, Austria, Lithuania and Poland followed the US example by imposing their own sanctions on Dodik, citing his continued role in undermining Bosnia and Herzegovina's constitutional order.⁵² Earlier, the UK had imposed sanctions on Dodik in April 2022 for 'undermining the legitimacy and functionality' of Bosnia and Herzegovina.⁵³ This external pressure triggered a wave of account closures, forcing those affected to restructure ownership chains in order to retain control of their assets and operations.

A detailed review of corporate registries reveals that three firms subject to sanctions – Agape, Fruit Eco and Agro Voće – underwent formal changes to their ownership and legal structure between October 2023 and April 2024. All three companies were previously registered to Dodik's immediate family members, including his children and relatives by marriage. Following their designation, they were reregistered under new names – Agape Best, Zelena Jabuka and Agro Destil – and placed under the control of proxies more distantly related to Dodik, including his son-in-law Pavle Ćorović and relatives Aleksandar and Mirko Dobrić. Notably, the newly registered entities shared addresses, business sectors and infrastructure with their predecessors, suggesting that these were formal rather than functional restructurings. This pattern suggests the use of familial proxies and rebranding to maintain operational continuity while circumventing financial restrictions.

COMPANY NAME	AGAPE	FRUIT ECO	AGRO VOĆE
Date of registration	13 December 2016	28 September 2007	13 May 2008
Owner(s)/director(s) and relation to Milorad Dodik	Gorica Dodik (daughter) and Ivana Dodik (daughter-in-law)	Igor Dodik (son) and Mirko Dobrić (relative)	Gorica Dodik (daughter) and Goran Dodik (brother)
Sanction date	20 October 2023	20 October 2023	20 October 2023
New company name or structure	Agape Best	Zelena Jabuka	Merging with Agro Destil
Date of new registration	17 November 2023	25 April 2024	30 April 2024
New owner(s)/director(s) and relation to Milorad Dodik	Aleksandar Dobrić (relative)	Mirko Dobrić (relative)	Pavle Ćorović (son-in-law)

FIGURE 3 Corporate restructuring of sanctioned companies linked to Milorad Dodik.

SOURCES: Akta; US Department of the Treasury, US Treasury sanctions members of Milorad Dodik's family and patronage network, 20 October 2023, <https://home.treasury.gov/news/press-releases/jy1825>; authors' analysis. (Akta is a business web portal in Bosnia and Herzegovina that provides access to company profiles, official records and contractual information, including data on mergers and ownership changes. See Akta, *Obavještenje o pokretanju postupka spajanja uz pripajanje društva Agro voće d.o.o. Laktaši društvu Agro destil d.o.o. Laktaši*, 30 April 2024, <https://www.akta.ba/tenderi/privatizacija/2504388/obavjestenje-o-pokretanju-postupka-spajanja-uz-pripajanje-drustva-agro-voce-doo-laktasi-drustvu-agro>).

In an apparent attempt to insulate the family's wealth from a new round of US sanctions due to take effect in January 2025,⁵⁴ Ćorović acquired minority shares in two commercial banks in Bosnia and Herzegovina.⁵⁵ His goal was reportedly to pre-emptively safeguard access to personal and business financial services. However, despite these ownership stakes, Ćorović reported that both banks refused to open accounts for him.⁵⁶ One bank cited its internal policy and the other referenced compliance with sanctions regulations.⁵⁷ This incident demonstrates that the proxy acquisition of stakes in financial institutions does not necessarily mean those institutions will override their obligation to adhere to global regulations.



Corporate restructuring: Milorad Dodik leaves the Court of Bosnia and Herzegovina, where he was on trial for not respecting the decisions of the Office of the High Representative, January 2024. © Samir Jordamovic/Anadolu via Getty Images

State-enabled salary payments for sanctions evasion

Bosnia and Herzegovina accounts for approximately one-third of all sanctions imposed in the Western Balkans,⁵⁸ with 76 individuals and entities having been designated by the US alone.⁵⁹ However, rather than isolating sanctioned officials from state resources, political leaders have developed compensatory mechanisms that blunt the financial impact of these measures. One such strategy is the institutionalization of cash salary payments to public sector employees without active bank accounts, effectively bypassing restrictions imposed by the financial system.

In Republika Srpska, this approach relies on legislative changes, cash transactions and state infrastructure to ensure that income continues to flow to designated individuals. Modifications to legislation at both the local and national levels – initiated by sanctioned officials – have solidified these practices.⁶⁰ For example, in April 2024, Republika Srpska's labour law was revised to explicitly permit cash payments to sanctioned individuals through the postal service.⁶¹ Thus employers are permitted to make payments outside the formal banking sector, provided they notify the tax administration and justify doing so. A similar initiative was introduced at the state level in March 2025.⁶² Both developments were spearheaded or endorsed by officials already under US sanctions, illustrating the political will to shield designated actors from financial exclusion. ■

Political evasion strategies

Political evasion strategies refer to the methods used by sanctioned actors to resist reputational and institutional isolation. These include lobbying foreign governments to overturn designations, reframing sanctions as foreign interference to bolster domestic legitimacy, and initiating legal reforms that shield them from accountability. The case of Bosnia and Herzegovina illustrates this clearly: sanctioned officials have used their designations to consolidate power, neutralize institutional checks and introduce new laws designed to circumvent restrictions.

Direct action to secure sanction delisting

Over the past few years, sanctioned individuals linked to organized crime and corruption, including figures from Albania, Bosnia and Herzegovina and Serbia, have intensified legal efforts to secure their removal from international sanctions lists, particularly those maintained by the US and UK. These strategies involve formal litigation, targeted communication campaigns and direct political lobbying. They often seek to reframe designations as politically motivated, while circumventing the immediate financial restrictions.

A notable example is Sali Berisha, the leader of Albania's opposition Democratic Party, who was declared *persona non grata* by the US and the UK due to allegations of corruption and links to organized crime.⁶³ Berisha legally challenged both decisions. A UK court rejected his appeal,⁶⁴ affirming the evidentiary basis for the designation. Similarly, the legal action he took against former US Secretary of State Antony Blinken in a Paris court yielded no favourable outcome.⁶⁵

In response, Berisha stated that his lawsuit was an act to defend his own dignity and that of the Albanian people, even though the court dismissed the case due to Blinken's diplomatic immunity and Berisha's lack of EU citizenship. Berisha also emphasized that diplomatic immunity should not cover defamation, implying that the court's decision would not absolve the moral or legal responsibility for the accusations made against him.⁶⁶

In the run-up to Albania's general election on 11 May 2025, Berisha made several attempts to restore his relationship with the US. As part of this strategy, his party hired Christopher LaCivita, a high-profile political strategist best known for his involvement in Donald Trump's 2024 presidential campaign.⁶⁷ In a symbolic gesture seemingly aimed at aligning with Trump's political style and rhetoric, the Democratic Party also named its electoral coalition the 'Alliance for a Glorious Albania'.⁶⁸

At the same time, a lobbying contract was drawn up in the US with the consultancy firm Continental Strategy, with the aim of improving Berisha's standing with the new US administration and the lifting of his designation.⁶⁹ The agreement, signed by a senior Democratic Party official, was valued at US\$6 million and reportedly financed by the American-Albanian foundation 'Make Albania Great Again'.

As part of the lobbying effort, a letter was sent to US Secretary of State Marco Rubio in March 2025, formally requesting that Berisha be granted a visa to enter the US.⁷⁰ The substantial financial commitment involved in the contract attracted significant domestic attention and prompted an investigation by Albania's Special Anti-Corruption and Organized Crime Structure.⁷¹

However, as of the date of this report's publication, Berisha remains unable to travel to the US. In the May elections, his coalition secured 50 seats in the 140-seat parliament, second only to the ruling Socialist Party, led by Prime Minister Edi Rama, which won 83 seats.⁷²

Tom Doshi: When the impact of sanctions fades away

While US and UK sanctions against Democratic Party leader Sali Berisha remain a central topic in Albania's political and public discourse, those imposed on less prominent political figures appear to have lost their public impact.

Tom Doshi, a businessman and chairman of the Social Democratic Party, was given a travel ban by the US in 2018 due to his 'involvement in significant corruption'.⁷³ Doshi himself later revealed that he had also been sanctioned by the UK.⁷⁴



Tom Doshi. © Gent Shkullaku/AFP via Getty Images

In the 2021 general election, the Social Democratic Party won three seats in the 140-member parliament, one of which was taken by Doshi. However, shortly after the vote, tensions escalated and Doshi resigned as an MP, publicly stating that he wanted to be free to clear his name of unfounded allegations.⁷⁵ The move was also seemingly an effort to be seen as taking his designation seriously and ease pressure from the US embassy regarding his political role.⁷⁶ Doshi did, however, remain the party's chairman. The incident received considerable public attention.⁷⁷

During the 2025 election season, however, Doshi made no reference to his sanctions, and the issue gained little traction in public discussions. His party once again secured three parliamentary seats, increasing its national vote count from 35 475 to 47 561.⁷⁸ Doshi is expected to take his seat in parliament this time, having won a mandate in the district of Shkodra. Unlike four years ago, there has been no discernible pressure from the sanctioning entities on the issue so far. ■

A similar trend has emerged in Republika Srpska, where various political leaders expanded their lobbying activities in Washington between December 2024 and May 2025. These initiatives have sought to challenge international sanctions, undermine the authority of the High Representative in Bosnia and Herzegovina and realign with influential US political actors. Central to these efforts is Republika Srpska's former president, Dodik.⁷⁹

In December 2024, Dodik's chief of staff, Danijel Dragičević, who is himself designated by the US,⁸⁰ reportedly signed a contract with the US law firm Zell and Associates on behalf of the Office of the President.⁸¹ The agreement aimed to challenge the legal basis of Dodik's sanctions, and advocate for a revision of the Dayton Agreement and the mandate of the High Representative for Bosnia and Herzegovina.⁸² According to local media reports, the contract was worth US\$500 000 annually.⁸³ In March 2025, a second agreement was made with RRB Strategies,⁸⁴ a firm led by Rod Blagojevich, an American politician of Serbian origin. Blagojevich was sentenced to 14 years in prison for corruption in December 2011,⁸⁵ but had his sentence commuted in 2020 before being pardoned by Trump in 2025.⁸⁶ This contract explicitly framed the sanctions as a politically motivated campaign against Dodik and the leadership of Republika Srpska.⁸⁷

A third agreement, signed with Stokes Strategies in April 2025, introduced a more ideologically aligned narrative. Filed with the US Department of Justice under the Foreign Agents Registration Act, the firm's disclosure memorandum characterized the sanctions as an attack on conservative political values and Christian identity in Republika Srpska.⁸⁸ The contract, brokered through Republika Srpska's representative office in Austria,⁸⁹ committed to monthly fees of US\$65 000, following an initial retainer of US\$130 000.⁹⁰

While the use of lobbying to challenge sanctions is not a new phenomenon in the Western Balkans, recent efforts stand out due to their increased intensity and ideological framing. This was particularly notable in anticipation of a potential change in attitude towards sanctioned individuals within the US administration in January 2025.



Political shielding: Former Albanian Prime Minister Sali Berisha (left), who is under a judicial control order due to corruption charges, leaves the special structure against corruption and organized crime headquarters in Tirana, January 2025.

© Olsi Shehu/Anadolu via Getty Images

Betting on Trump?

Sanctioned political figures in the Western Balkans, such as Milorad Dodik, may view Donald Trump's second term in office as both an opportunity to reshape diplomatic ties and a possible chance for sanctions relief.

In public statements, Dodik described Trump's comeback as a 'good sign',⁹¹ describing his administration as being more sympathetic to Serbian interests and less influenced by what he termed 'globalist interference'.⁹² He has openly expressed hope that Trump's second term will result in the lifting of US sanctions, which he characterizes as politically motivated.⁹³

In April 2025, Antal Rogán, a close aide to Hungary's Prime Minister Viktor Orbán, was removed from the US sanctions list. The State Department cited this as aligning with foreign policy interests.⁹⁴ The delisting of Rogán, who had been accused of corruption, signalled a significant shift in US sanctions policy towards Hungary.

The move seems to have been interpreted by sanctioned figures such as Dodik and Berisha as a potential precedent, reinforcing their belief that aligning with Trump could facilitate their own delisting. Both leaders have since intensified their lobbying efforts in the US. But while this approach may increase their visibility, it has not, thus far, met with any success. Five months into Trump's second term, Dodik and Berisha remain subject to US sanctions, suggesting that aligning with shifting political currents is insufficient in itself to secure delisting.

As the research in this paper shows, the formal status of being sanctioned may not result in significant operational constraints. However, these cases illustrate that continued enforcement is more likely to be tied to broader strategic considerations than to changes in conduct or affiliation. ■

Earlier examples include Slobodan Tešić, who was sanctioned by the US in 2017 for corruption and arms trafficking.⁹⁵ In February 2018, he engaged Sonoran Policy Group⁹⁶ and the law firm Venable to support his delisting.⁹⁷ These efforts have so far been unsuccessful, and Tešić is still a designated individual. However, as previously mentioned in this paper, he reportedly remains a dominant player in Serbia's illicit weapons trade.⁹⁸

A more informal approach can be seen in the case of Svetozar Marović, who was president of Serbia and Montenegro from 2003 to 2006 and a long-time leader of Montenegro's Democratic Party of Socialists. Despite multiple legal, diplomatic and sanctions-based efforts, Marović has remained beyond the reach of Montenegrin justice. In May 2016, he admitted to leading an organized crime group and orchestrating major financial crimes against the municipality of Budva. Following two plea agreements, he served a brief six-month custodial sentence.⁹⁹ Upon release, he travelled to Serbia, ostensibly for medical treatment.¹⁰⁰ Despite an INTERPOL Red Notice,¹⁰¹ seven extradition requests,¹⁰² US sanctions¹⁰³ and political manoeuvring,¹⁰⁴ he has not returned to Montenegro to serve his full sentence. Serbian President Aleksandar Vučić has described the situation as 'complicated'.¹⁰⁵



Beyond reach: Former US Secretary of State Colin Powell meets former president of Serbia and Montenegro, Svetozar Marović (right), during a visit to Belgrade. © Koca Sulejmanovic/AFP via Getty Images

Marović appears to have relied on religious and political networks to delay his extradition.¹⁰⁶ According to sources in the Montenegrin security sector,¹⁰⁷ he has maintained links with the Serbian Orthodox Church, which may have facilitated indirect communication with the Serbian authorities,¹⁰⁸ especially after he was sanctioned by the US.¹⁰⁹ While there are allegations of financial arrangements connected to these networks, they remain unverified.

Marović's case differs from others outlined in this report in that it appears to lack formal legal or lobbying representation. Instead, it demonstrates the impact of informal influence mechanisms on sanctions evasion, particularly when religious institutions maintain close links with political elites. While less visible, this form of lobbying can be equally effective in shaping outcomes and delaying enforcement.

Taken together, the cases of Berisha, Dodik, Tešić and Marović reveal the range of tactics used to circumvent or mitigate sanctions in the Western Balkans. These range from structured lobbying campaigns and litigation to ideologically charged narratives and informal influence through religious or political networks. All four individuals have portrayed their designations as politically motivated and have seemingly sought to exploit changes in geopolitical alignments to their advantage, with a particular focus on the shifting US political landscape.

Shifting operations to favourable political environments

A central strategy for sanctions evasion identified in the case of the North Kosovo Group was the strategic relocation or concentration of business activities in jurisdictions offering both political protection and access to state resources. Instead of withdrawing from economic life, sanctioned individuals and entities adapted by becoming more deeply embedded within national and subnational systems of political patronage and public contracting.

One of the clearest illustrations of this politically shielded economic continuity is the performance of Novi Pazar-Put, the construction company within the sanctioned Inkop conglomerate. Since 2021, the firm has won 391 public procurement contracts, most of which were issued by the Serbian government or municipal authorities.¹¹⁰ Notably, 39% of these tenders were issued by the state road agency, JP Putevi Srbije, with additional contracts being awarded by municipalities such as Tutin and Novi Pazar.

Similar patterns are evident in the activities of Radule Stević. Throughout 2024 and 2025, his company and a second firm directed by his daughter continued to win large-scale tenders funded by Serbian parallel institutions in Kosovo.¹¹¹ These entities, which are under the formal control of the Serbian authorities but are not recognized by Kosovo, issued numerous contracts – often exceeding millions of euros – for infrastructure development, agricultural support and residential construction. The continued allocation of public funds to these companies suggests a deliberate shielding of sanctioned individuals through opaque administrative structures and political alignment with the ruling Serbian party.

Furthermore, the public visibility of sanctioned actors reinforces this impunity. For instance, Zvonko Veselinović was seen attending a large Serbian Progressive Party public rally led by President Aleksandar Vučić in April 2025.¹¹² Meanwhile, Milan Radoičić, who claimed responsibility for the fatal Banjska attack in 2023, has not faced legal consequences and remains shielded by the slow progress of judicial proceedings in Serbia. Although the Serbian prosecution announced that a decision on a possible indictment against Radoičić would be published in December 2024 or January 2025,¹¹³ this had not occurred by the time this brief was published.

Marović is another compelling example of a politically exposed figure who has strategically relocated business activities in order to avoid enforcement. Following US sanctions, he reportedly attempted to obscure his ownership of assets by transferring properties in Serbia to intermediaries. A notable example is a 1 700-square-metre plot in Budva, which was initially owned by Fifth Avenue Investments. This was subsequently transferred to Luss Investments, a UK-registered offshore entity with ties to Belgrade businessman Zoran Mitrović. This activity has further fuelled suspicions that proxy ownership is being used to circumvent legal consequences.¹¹⁴

Marović's son, Miloš, has also followed this pattern. In 2016, he was convicted of facilitating financial crimes¹¹⁵ and was sentenced to one year in prison and fined €385 000, which he paid in full.¹¹⁶ However, he relocated to Serbia, secured citizenship in 2017,¹¹⁷ and did not serve his custodial sentence, which became statute-barred in September 2020.¹¹⁸ Montenegrin authorities have expressed concern that Svetozar Marović's sentence may also expire in October 2026.¹¹⁹ These cases highlight the strategic use of dual citizenship and regional legal inconsistencies to obstruct judicial enforcement.

Miloš Marović has reportedly accumulated substantial assets in Serbia, including extensive landholdings, real estate and an agribusiness worth several hundred thousand euros.¹²⁰ Both he and his father have also been linked to a €9 million yacht leased through an offshore company and later acquired by Radoičić. Initially encumbered with debt, the yacht was reportedly purchased at a discount by a

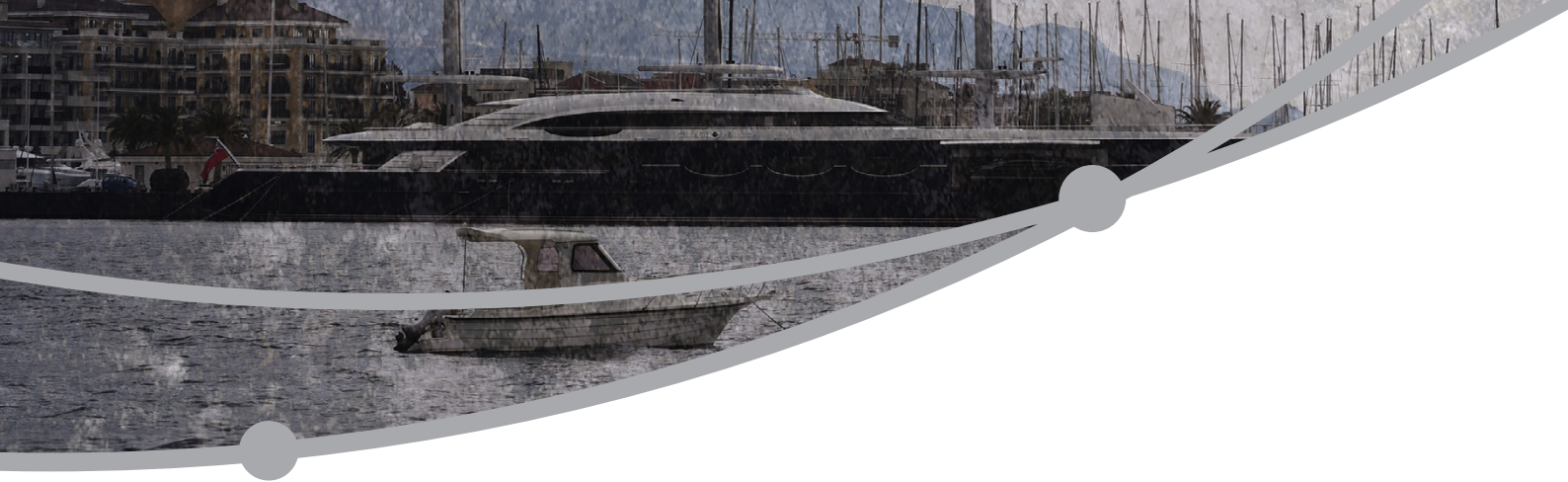


Political manoeuvring: Former Prime Minister of North Macedonia Nikola Gruevski speaks with protesters during a demonstration outside the court in Skopje. © Robert Atanasovski/AFP via Getty Images

politically connected company before being resold to Radoičić, suggesting a pattern of elite asset recycling through informal channels.¹²¹

A final illustration of moving operations to a politically advantageous location is Nikola Gruevski, who served as prime minister of North Macedonia from 2006 to 2016. After being convicted multiple times for corruption and abuse of power, Gruevski fled the country and was granted political asylum in Hungary in November 2018.¹²² In July 2021, he registered a consultancy firm, International Corporate and Investment Consulting. Despite being designated by the United States for corruption in April 2022,¹²³ the company continues to operate, reporting a post-tax profit of €22 509 in 2022 and €5 665 in 2023.¹²⁴

Gruevski's ability to maintain a commercial presence in Hungary is indicative of the permissive environment offered by certain host states, in which political alignment and asylum protections shield designated individuals from effective enforcement action.



CONCLUSION

The cases examined in this paper illustrate how sanctions, despite their intended disruptive purpose, often trigger adaptation rather than retreat. In the Western Balkans, designated individuals and networks have not retreated from public life or economic activity. Rather, they have reconfigured their strategies, both economically, through proxy ownership and opaque contracting, and politically, through legal reforms, lobbying and narrative control.

This capacity for adaptation reflects more than just individual ingenuity. It indicates the existence of systemic conditions that allow sanctions to be absorbed, repurposed and, in some cases, politically instrumentalized. Instead of isolating targets, in this context sanctions can be reframed as evidence of external hostility, allowing elites to present themselves as defenders of national sovereignty or victims of international agendas.

What emerges is a picture of resilience, shaped not only by personal networks, but also by institutional complicity and legal ambiguity. In isolation, sanctions are neither inconsequential nor transformative. They operate in a landscape where informal economies, political patronage and weak enforcement often render formal restrictions ineffective.

Therefore, understanding the strategies that sanctioned actors deploy in both the economic and political spheres goes beyond merely documenting evasion. It provides insight into how political and criminal power is sustained in the face of external pressure and highlights the fact that accountability is rarely achieved through financial restrictions alone. The challenge lies in not only enforcing sanctions, but also in addressing the underlying structures that enable them to be resisted so effectively.

Recommendations

Ensure consistent and unambiguous sanctions messaging. The cases illustrated in this report demonstrate how ambiguous language used by sanctioning bodies can be instrumentalized to manipulate public perception. Messaging around sanctions, including the scope of travel bans and legal status, must be clear and consistent across all issuing authorities and updated promptly to prevent sanctioned actors from claiming reputational vindication.

Strengthen transparency and oversight of lobbying by sanctioned actors. Sanctioned individuals in the region increasingly rely on high-cost lobbying campaigns and legal firms to challenge their listings or reframe their status. The authorities in sanctioning countries should enforce rigorous disclosure

of contracts and funding sources under foreign agent registration laws, and monitor circumvention through foundations and proxies.

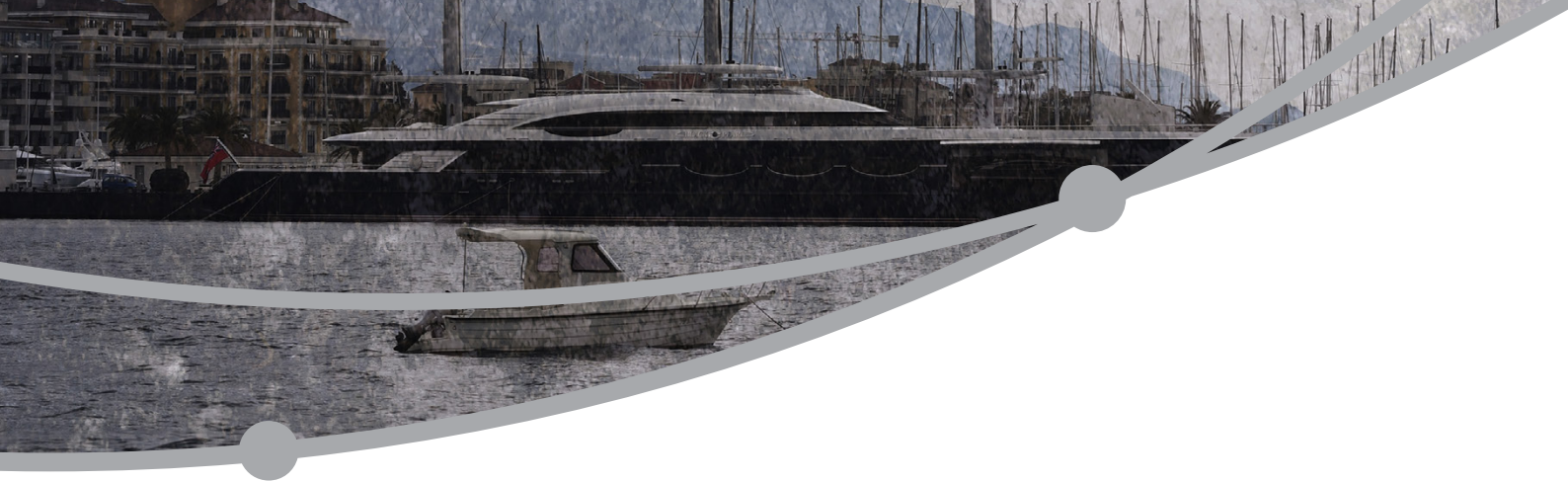
Expand monitoring of informal influence channels. The report highlights how sanctioned individuals exploit less visible networks, such as religious institutions and diaspora organizations, to gain protection and influence. These networks should be monitored as part of sanctions enforcement assessments, particularly where they are closely aligned with political power.

Improve cross-border coordination on ownership and procurement. Sanctioned individuals routinely transfer assets across borders, rebrand companies and access public procurement in favourable jurisdictions. Cross-jurisdictional registries of beneficial ownership and synchronized sanctions enforcement mechanisms should be enhanced to close these gaps.

Introduce sanctions compliance measures in public procurement. Despite formal designations, companies linked to sanctioned individuals continue to win government contracts, particularly in Serbia and Republika Srpska. To prevent this, domestic procurement systems must integrate sanctions compliance checks, including real-time verification of beneficial ownership and disqualification criteria for opaque or restructured entities.

Support investigative journalism and independent monitoring. Much of the information about sanctions evasion has come from investigative outlets. Sustained support for the media, civil society and watchdog groups is essential for analysis, public accountability and the early detection of evasion strategies.

Close legal loopholes that enable proxy ownership and familial transfers. The practice of using family members and political associates to retain control over assets and business operations is widespread. National legal frameworks should be amended to recognize and penalize proxy control, especially in cases involving public funds or regulated sectors.



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