TURKEY:
NO COUNTRY FOR THE PURGE VICTIMS
A LIFELONG BADGE ATTACHED TO THE PURGE VICTIMS

#36  #OHAL  #KHK
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According to official statements, during the emergency rule (2016-2018), the Turkish Government enacted 32 emergency decrees, under which:

- 125,678 individuals were dismissed from public service;
- 3,213 retired officers were stripped of their ranks and medals; and
- more than 2,671 legal persons and 4,911 entities were closed down and their assets were confiscated and transferred to the Treasury without any compensation.

**Purported justification for emergency decrees:**

The emergency decrees justified the measures that enabled sanctions on individuals and legal persons for:

- having “membership, affiliation, relationship or connection (cohesion) with” the outlawed Gulen Movement/Structure;
- having “membership of, affiliation, link or connection with terrorist organizations or structures, formations or groups established by the National Security Council (NSC) to perform activities against the national security of the State”; or
- having been considered “to be a member of, or have a relationship, connection or contact with terrorist organizations or structures/entities, organizations or groups, established by the NSC to engage in activities against the national security of the State.”
The emergency decrees targeted individuals and legal persons in an ad hominem nature by annexing lists of names of the sanctioned individuals and legal persons. However, apart from the above-mentioned general reasoning, the emergency decrees presented neither an individualized justification nor an explanation of, or reasoning for, why those particular people/entities were sanctioned. Likewise, the emergency decrees did not provide definitions of “membership, relation, connection, contact, affiliation, link”, or the assessment criteria that were used to determine that public servants be dismissed and legal persons closed down.¹

**Direct and indirect consequences of emergency dismissals:**

Individuals who were sanctioned under the ad hominem emergency decrees were indefinitely and permanently dismissed from public service. Under these emergency decrees, they also:

(i) shall be deprived of their ranks and their positions as public officials;
(ii) may not use their titles, if any, e.g., ambassador, governor, etc;
(iii) shall not be re-admitted to the organization in which they had previously held office;
(iv) shall be stripped of rank (for the already retired public servants), and of combat medals;
(v) may not be re-employed and assigned, either directly or indirectly, to any public service;
(vi) may not become the founders, partners and employees of private security companies;
(vii) shall be evicted from public residences or foundation houses; and
(viii) moreover, their passports, gun licenses, seamanship or pilots’ licenses, shall be cancelled.

Besides the direct consequences, mentioned above,

- Turkey’s High Election Board decided (2019/2363, 10th April, 2019) that the dismissed public servants could not be elected to offices within local administrations, e.g., as mayor, alderman or mukhtar (local elected administrator for villages).

Furthermore, as far as certain professions and sectors are concerned, a dismissal actually results in the prohibition of the right to work in the private sector, as well as in the public sector:

- Namely, the Ministry of National Education refuses to issue a working license for a dismissed teacher, and this is necessary to work in private educational institutes.
- Likewise, the Ministry of Justice refuses to issue a lawyer’s license to dismissed judges, prosecutors and law school academics.
- Furthermore, dismissal under an emergency decree is registered in all the official databases, which means that any private sector employer, who might otherwise hire a dismissed civil servant, avoids hiring them.

This report will explain the indirect consequences of being dismissed under an emergency decree, and will show how these consequences affect every angle of daily life, regardless of whether the person in question is subject to investigation or prosecution.
DEPRIVATIONS CAUSED BY THE STATE OF EMERGENCY DECREES

1) Purged civil servants are blacklisted in the databases of the Employment and the Social Security Agencies with the code 36/OHAL/KHK

According to the Circular numbered 2016-16 published on August 2nd, 2016, by the Presidency of the Social Security Institution, a 36/OHAL/KHK code was assigned to the purge victims. Hence, in databases of the Employment and the Social Security Agencies, and consequently in all of the databases of all public and quasi-public entities, purge victims are blacklisted with the code 36/OHAL/KHK. That this person was dismissed under an Emergency Decree is also written into these databases.

The Presidency of the Social Security Institution’s subsequent circulars, dated September 1st, 2016, numbered 2016-20, and April 24th, 2019, numbered 2019-9, has institutionalized this blacklisting policy.

Every employer in the private sector who would consider hiring a purged civil servant can see the registry entry which says that he/she was dismissed by the Government due to an Emergency Decree. Such a warning constitutes a very important obstacle in relation to the employment of the person, because employers are afraid of hiring those persons who are blacklisted by the Government.
2) Purged civil servants cannot be foster families

(Euronews published the story of a purge victim whose foster child were taken by the Ministry of the Family.)

Since the purge victims were dismissed with the assumption that they had: “membership, affiliation, relation or connection (cohesion) to terrorist organisations or a group which is dangerous for national security, they cannot be foster families. If they are already a foster family, their child is taken back by the relevant public authority”.

3) Purged civil servants cannot be mayors, aldermen or mukhtars (a local elected administrator for villages).

Turkey’s High Election Board decided that dismissed public servants who were elected as mayors, members of a city council (alderman) or mukhtars could not hold the office, although their candidancy had already been approved prior to the election.³

4) Purged civil servants cannot be lawyers

Pursuant to the Law No.1136, under the condition that they have no criminal record, every Turkish citizen who has a bachelor’s degree in law has the right to be admitted to an internship with a view to becoming a lawyer. However, the Ministry of Justice has been barring purged law academics, judges and prosecutors, from starting an internship as a lawyer, and from being a lawyer. The dismissed law academic, Cenk Yigiter, and the dismissed jurist, Levent Maziliguney, are two of hundreds of victims.
5) Purged civil servants cannot be accountants

Those who apply to undertake the examinations to take up the accounting and financial advisory professions have to sign an affidavit saying that they are not dismissed from public service under an Emergency Decree. (The mentioned affidavit can be seen on the website of the Chamber of Accountants and Financial Advisors)

6) Purged civil servants cannot work as architects, engineers, laboratory workers, or as technicians in building inspection companies

With its decision, dated 16th April, 2018, and numbered 67634, the Ministry of the Environment and Urban Planning prohibited the purged civil servants from working as architects, engineers, laboratory workers, or as technicians in building inspection companies.

7) Purged civil servants cannot attend vocational courses

Those who are blacklisted with the code 36/OHAL/KHK are not accepted on vocational courses and employment projects. Under the instruction (dated 1st August, 2017, and numbered 28025) of the Turkish Employment Agency, the dismissed public servants are not accepted on either vocational courses and/or employment projects.
8) Purged civil servants cannot work in private educational institutions

Under the Emergency Decrees, 6021 academics and 34,288 teachers were dismissed from the public sector. The Directorate of Private Educational Institutions for the Ministry of National Education prohibited these academics and teachers from working in private educational institutions.

Given that driving courses come under the oversight of the Ministry of National Education, the purged civil servants cannot work as driving instructors either. Likewise, purged teachers and physiotherapists cannot work in private rehabilitation centers.

Even if they have been acquitted, they cannot work in private educational institutions. Two documents (below) show that a purged teacher was denied the license that is needed to work in private educational institutions, although the Prosecutor’s Office has dropped the investigation against her.
9) Purged civil servants cannot work as sailors

Purged civil servants cannot work as sailors. The Ministry of Transportation will not give a Seaman’s Identity Card to purged civil servants, even though they have completed all of the necessary courses and training successfully.

10) Purged civil servants cannot work as on-site (workplace) doctors, or as occupational safety specialists.

Under Art. 9 of Decree Law no. 673, purged civil servants cannot work as on-site (workplace) doctors or as occupational safety specialists. The Ministry of Labour and Social Security, under Decree Law 673 (Art. 9), cancelled the licences of purged civil servants and has been refusing to issue new ones.
11) Purged civil servants are denied the licences needed to run businesses. It is also widely reported that some mayors are refusing to give business licenses to purged civil servants. For instance, the Municipality of Anamur refused to give a business license to a purged public servant on the grounds that he failed to pass a security investigation.

12) Purged civil servants who work as veterinarians cannot have an artificial insemination certificate and cannot perform their professional duties in agricultural support programs.

13) The database of the General Directorate of the Land Registry (TAKBIS) includes a list of suspicious people which consists of those dismissed under emergency decrees. Those included on this list cannot participate in real estate transactions, either as a party (vendee or vendor) or as a witness.
14) Upon an instruction by the Ministry of Justice, the Union of Turkish Public Notaries produced a list of suspicious people, which consists of those dismissed under emergency decrees. People included on this list cannot carry out any procedures as notaries, other than giving power of attorney. This means that they cannot carry out hundreds of legal procedures, including selling their cars or signing construction contracts.

15) The database for the Social Relief Program (SOYBIS) includes a list of those who have been dismissed under emergency decrees. Disabled people whose first caregivers (such as parents, sons, daughters, sons-in-law and daughters-in-law) are dismissed under emergency decrees, cannot benefit from social care funds.

For instance, Burcu Aktaş, who is 70% disabled, is denied benefits, such as the care allowance, for disabled persons, because his father is a purged public servant. Likewise, Aslı Kir, whose first care giver, Emine Ozlu, is married to a purged public servant, is denied the benefits for disabled persons.
Similarly, Sevdegül Güler, 98% disabled because of a condition called SSPE, also known as Dawson’s Disease, was denied a care allowance on the grounds that her mother, Ümmühan Güler, was a purged teacher. Sevdegül Güler passed away on August 24th, 2020.

16) Those dismissed under emergency decrees, and their spouses and children, cannot benefit from the General Health Insurance for people with a low income and from the social rights that are offered to disabled people.

Purged public servants, who have lost their jobs and pension rights, and who cannot find a new job because they have been blacklisted, are denied the right to benefits from the General Health Insurance for people with low incomes, and those social rights that are offered to disabled people.

For instance, Zehra Dogramacioglu, who is a purged doctor and suffers from cancer, and her daughter, who suffers from Down Syndrome, are denied the benefits from the General Health Insurance for people with low incomes, and those social rights that are offered to disabled people.

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17) Purged public servants cannot have passports and travel documents.

Through the Emergency Decree Laws and Law no. 7188, the Minister of the Interior cancelled the passports of purged public servants, their spouses and children. In December, 2017, the Turkish Government announced that 234,419 passports had been revoked. Subsequently, 20,000 more public servants were dismissed, and the passports of these people and their spouses were cancelled. Those who previously had no passports were subjected to a passport ban. Hence, it is estimated that some 500,000 individuals are deprived of the freedom to leave the country.⁷

18) Purged public servants cannot open bank accounts and are discriminated against in financial transactions and procedures

Similarly, in one of several similar instances, Suzan Uzpak, a purged teacher, could not receive the money sent to her via bank wire. Vakif Bank, a public financial institution, gave as a reason that her name was among those on the prohibited national IDs list.⁸

Similarly, R.A., a purged judge, could not receive the money sent to him via bank wire by his sister.⁹ On this occasion, the private bank justified its action by giving the same reason: the prohibited national ID list.
19) Purged public servants are discriminated against in regard to insurance services

Insurance companies, because of a circular sent to them by the relevant public authority, do not pay compensation to those who are purged public servants, which they are obliged to pay under the insurance policies that they have issued. For instance, Aksigorta A.S and Doga Sigorta A.S did not pay the compensation which they were obliged to pay to claimants, on the grounds that they were purged under emergency decrees.

20) Purged public servants are discriminated against in relation to business development and incentive credits.

The Organization for the Development of Small and Medium Enterprises does not provide incentive credits to legal and real persons who are affiliated with purged public servants.
21) Purged public servants are discriminated against in relation to mandatory military services

Under Law no. 7179, mandatory military service is for a period of twelve-months. Yet those who have graduated from a bachelors’ program perform mandatory military service for six months, rather than twelve. However, purged public servants cannot benefit from this privilege.

22) Purged academics are discriminated against in academic publishing.

It has been widely reported that Turkish academic journals do not publish articles written by purged academics. Associate professor Gül Köksal is one of the many victims of this practice.⁴⁰
23) Purged public servants cannot enter the exams for associate professorships.

According to the dictum of the Presidency of the Inter-Universities Board, purged public servants cannot enter the exams for associate professorships.
24) Purged public servants cannot receive science scholarships.

The Scientific and Technological Research Council of Turkey (TÜBİTAK) is of the opinion that purged public servants cannot receive science scholarships. According to TÜBİTAK’s regulation on the eligibility conditions for science scholarships, not being a convicted felon is not a requirement, while not being a dismissed public servant is a requirement. 11

In November, 2020, The Turkish media widely reported that TÜBİTAK had cancelled a science scholarship that had been given to a purged public servant, and requested that the monies that had already been paid should be returned with interest.

And Ankara Administrative Court decided that the TÜBİTAK’s policy and the said decision was correct and was in line with the public’s interest. 12
25) Purged public servants and their families are discriminated against in relation to university admissions and tuition fees.

On September 5, 2021, it was reported that a student who ranked among the most successful 100 candidates in the nation-wide university examination was not granted a scholarship by one of the top universities in Turkey on the grounds that his father was a purged public servant.

Similarly, another private university, Atılım University, excluded students who are themselves, or whose parents are, purged public servants, from tuition fee reductions or the facility to pay fees in instalments.  

26) Purged public servants cannot be school bus drivers.

The Governorship of the Province of Sivas decided that, under the regulations on school vehicles, purged public servants could not be school bus drivers.
27) Purged public servants are discriminated against in taxation.

According to the dictum of the Turkish Revenue Administration, dated October 27th, 2017, purged public servants cannot benefit from tax concessions, reductions, facilities and exemptions. Based on this dictum, on October 6th, 2021, the Municipality of Atakum in Samsun Province refused the request of a purged public servant for a property tax reduction.

28) Purged physicians (M.D.) are not admitted to programmes leading to specializations in medicine

The Turkish Student Selection and Placing Centre (ÖSYM) refused to process Onur Erdem’s application (he is a physician) for programmes on specializations in medicine on the grounds of the necessity of lustration policies.
29) Purged public servants are discriminated against in relation to COVID19 economic reliefs.

The Turkish Government deprived purged public servants and their spouses of COVID19 economic reliefs. The Member of Parliament Omer Faruk Gergerlioglu, and the news outlet Gazete Duvar reported that several individuals who are either purged public servants or the spouse of a purged public servant have been denied COVID19 economic relief, such as the short-time working allowance.14

30) Purged public servants are discriminated against in terms of natural disaster aid.

After the earthquake at Elazig in 2020, Ummugulsum Tamam, a purged teacher, whose house was damaged, was denied the social relief for disaster victims. A Member of Parliament, Omer Faruk Gergerlioglu, announced this.15

Similarly, after the Izmir earthquake of 2021, Aysegül Dabak, a purged clerk, could not receive the social relief that was wired to her by the Izmir Municipality because the money sent to her was blocked on the grounds that her name was among those on the national IDs list as being forbidden.16
What is a penalty under the ECHR?

The concept of a “penalty” set out in Art 7 § 1 of the ECHR has an autonomous meaning (G.I.E.M. S.R.L. & Others v. Italy [GC], § 210). The European Court of Human Rights (“ECtHR”) is free to go beyond appearances and denomination by national laws, and can autonomously assess if a specific measure is substantively a “penalty” within the meaning of Art 7 § 1. The starting point for any assessment of the existence of a “penalty” is to ascertain whether the measure in question was ordered following a conviction for a “criminal offence”.

However, that is only one of the relevant criteria; the lack of such a conviction by the criminal courts is insufficient to rule out the existence of a “penalty” within the meaning of Art 7 § 1. (G.I.E.M. S.R.L. & Others v. Italy [GC], § 215-219). Other factors may be deemed relevant in this regard, including: the nature and aim of the measure in question (particularly any punitive aim), its classification under domestic law, the procedures linked to its adoption and execution, and its severity (G.I.E.M. S.R.L. & Others v. Italy § 211; Welch v. the United Kingdom, § 28; Del Río Prada v. Spain, § 82). However, the severity of the measure is not decisive in itself, because many non-criminal measures of a preventive nature may have a substantial impact on the person concerned (Van der Velden v. the Netherlands, 20689/08).

According to the ECtHR, the following measures are “penalties” within the meaning of Art 7 § 1:

- a confiscation order following a finding of guilt for a criminal offence (Welch v. the UK);
- an administrative fine imposed in an urban development case that is equivalent to 100% of the value of the wrongfully erected building (Valico SLR v. Italy);
- confiscation of land on the grounds of unlawful construction ordered by a criminal court following an acquittal (Sud Fondi srl & Others v. Italy; Varvara v. Italy) and confiscation of land on the grounds of illegal site development ordered by a criminal court following a discontinuance decision (G.I.E.M. S.R.L. & Others v. Italy); and
- permanent prohibition from engaging in an occupation ordered by a trial court as a secondary penalty (Gouarré Patte v. Andorra).

Are the dismissals under emergency decrees and deprivations therein a measure or a penalty?

The Turkish Government argues that the dismissals are measures necessitated by exigencies of the state of emergency, however the severity and duration of dismissal and the associated consequences may mean that dismissal qualifies as a penalty within the meaning of Art 7 § 1 of the ECHR.
It is helpful to consider how dismissal fits within Turkey's domestic law, as this is relevant to whether a measure will be found to be a penalty under Art 7 § 1 of the ECHR. Under Article 70 of the Turkish Constitution, every citizen has the right to enter public service. Article 48 of the Law on Civil Servants, and Article 11 of Law no. 2839, preclude certain persons from being civil servants, namely those who:

- have been denounced as bankrupt under a judgment;
- have been interdicted by a judgment;
- have been convicted of an offence committed with intent that requires imprisonment for one year or longer; or
- have been convicted for offences against state security or constitutional order, or disgraceful offences, such as fraud, bribery, theft, money laundering, racketeering, even when they have been pardoned.

As seen, losing the mentioned eligibility is an ancillary result following a conviction, an adjudication of bankruptcy or interdiction. Here, the point is that both eligibilities are reinstated with a new judgment five years after the serving of the given sentence (Plenary Session of Administrative Law Chambers of the Council of State, 2011/1214) or a judgment revoking the adjudication of bankruptcy or interdiction. By contrast, under the emergency decrees, a dismissal results in a permanent deprivation of the rights to be a civil servant and to be elected, even if the person concerned is not subject to investigation or prosecution, or is exonerated or acquitted.

Although the Turkish Government tends to justify the purging of public servants through the principles of lustration that are endorsed by Parliamentary Assembly of the Council of Europe in Resolution 1096 (1996), the Government’s ad hominem purge does not comply with the Guidelines on lustration annexed to Resolution 1096. The Guidelines stipulate the following:

a) Disqualification for office based on lustration should be no longer than five years;
b) Lustration shall not apply to elective offices;
c) Lustration shall not apply to positions in private or semi-private organisations;
d) Persons who ordered, perpetrated, or significantly aided in perpetrating serious human rights violations may be barred from office;
e) No person shall be subject to lustration only for association with, or activities for, any organisation that was legal at the time of such association or activities; and
f) In no case may a person be lustrated without his being furnished with full due process protection.

In summary, Turkey's ad hominem dismissal decrees may be characterised as a penalty, rather than a temporary measure in light of: (i) the scope and severity of consequences of dismissals and its perpetual status (explained in the first blog post); (ii) that dismissals entail deprivations heavier than those for a convicted felon; (iii) that dismissals do not comply with PACE Resolution 1096 and the Guideline on Lustration; and (iv) ECtHR's case law on the definition of punishment within the meaning of Art 7 § 1 of the ECHR.
CONCLUSION

In conclusion, it would not be an exaggeration to say that emergency decrees have significantly dented the sacked officials’ ability to earn their livelihood in a decent way. Enacted between 2016 and 2018, the emergency decrees do not include any provision on their duration, time limit, or due date for the measures or sanctions that are laid down therein. Moreover, all emergency decrees were approved by the Turkish Parliament. Having received the approval of the Parliament, emergency decrees are qualified as ordinary and permanent law. Thus, ad hominem measures or sanctions against more than 130,000 legal and real persons, have acquired the qualification of being part of permanent law.\textsuperscript{17}

The official end of emergency rule in 2018 summer,\textsuperscript{18} in this regard, only serves to obscure the nature of their lasting presence in the legal domain and in social life given their lifelong consequences. The situation has even gotten worse for many purge victims\textsuperscript{19} given the lack of measures to acquire legal remedy on the domestic realm and in the front of ECHR. For the fear of being overwhelmed by the inundation of trove of applications from Turkey, the Strasbourg-based court urges Turkish applicants to exhaust the domestic channels. But for observers and experts, this seems to be an implausible option given the dismal state of legal affairs and rule of law inside Turkey.\textsuperscript{20}

To dodge international criticism, the Turkish government set up a seven-member commission, dubbed as OHAL Commission, to deal with reviewing the applications by the dismissed public workers. Out of 130,000 so applications so far now, the Commission has only restored a small number of public servants to their posts.\textsuperscript{21} The Commission\textsuperscript{22} faces credible charges of slow-walking the review process. It never offers a plausible and convincing explanation for its refusals when it simply dismissed a file submitted by public workers. This foot-dragging and shambolic working leave purge victims increasingly disenchanted and disillusioned.

This report only offers a brief glimpse into the ever-widening plight of purge victims in the post-coup era as emergency decrees have substantially shut down the prospect of a decent living within the boundaries of Turkey. What amplifies their agony is the fact that the sacked workers are also denied travel abroad after their passports have been automatically revoked following dismissals. This lifelong travel ban hardens their suffering. In dozens of cases, authorities refused to waive the ban for countless terminally-ill people. The only and rare exception for this collective practice was the cancer patient Professor Haluk Savas who was briefly allowed for medical treatment abroad. What enabled his brief overseas travel on medical grounds was a concerted public pressure.\textsuperscript{23}

As the bulk of findings in this report attest, entire layers of daily life are under the ever-growing grip of the prohibitive mindset that denies the most basic components of livelihood to the dismissed officials. Even opening a bank account becomes a difficult challenge as laws are tailored to made inaccessible to them. Military service whose structure is clearly defined in laws is imposed on purge victims in different way, in clear departure from the procedure. The list of bans or practices, as documented by the report, illustrates the depth of agony and sufferings inflicted on sacked workers as private companies increasingly collaborate with authorities or act in fear of political backlash to deny the basic services to people in the post-coup era. To sum up, the emergency rule, more than three and a half years after its end, remains to be in place with dire consequences for its targeted population. This reality, often overlooked and ignored by observers, needs to be taken into account when analyzing the state of political and legal affairs in Turkey.
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Endnotes
3 High Election Board, Decision No: 2019/2363, 10th April, 2019.
4 Revocation of some powers : Art. 9 – (1) Among the persons, institutions or organizations that are empowered, within the scope of Article 12 § 1 (1) and (m) of the Law no. 3146 on the Structure and Duties of the Ministry of Labour and Social Security, dated 9th January, 1985, the powers of those who hold membership of, affiliation to, links with, or connections with, terrorist organizations or structures/entities, organizations or groups that are established by the National Security Council as engaging in activities against the national security of the State, shall be revoked by the approval of the Minister of Labour and Social Security upon the proposal of the Commission established by the Minister of Labour and Social Security.
https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806a2e37
5 https://stockholmcf.org/bedridden-woman-whose-mother-was-denied-care-allowance-due-to-alleged-affiliation-with-gulen-movement-decides/
6 https://www.dw.com/tr/t%C3%BCrkiyede-khkl%C4%B1lar-bize-ve-bal%C4%B1-muamelesi-yap%C4%B1yorlar/a-50521070
8 https://www.gazeteduvar.com.tr/gundem/2019/12/31/khkliye-banka-havalesi-de-yasak
10 https://barisininakademiisyenler.net/node/757
11 https://www.indyturk.com/node/275171/haber/t%C3%BCrkiyede-khkl-arka%C4%B1nt%C4%B1ka-bursu-ba%C5%9Furu-%C5%9Fartlar%C4%B1-olmakar-vag-sab%C4%B1ka-kayd%C4%B1-yok
12 https://www.indyturk.com/node/390326/doktora-%C3%B6%C4%9Frensi-al-%D8%C4%B1-%C3%9F%C4%B1-%C3%9F%C4%B1-%C3%9F%C4%B1-%C3%9F%C4%B1-
13 https://www.indyturk.com/node/2019/2020/02/06/unesco-bank-khkl-bursunu-faiziyle-geri-cek-gerek-
15 https://www.stockholmcf.org/turkish-govt-refuses-to-provide-aid-to-earthquake-victim-due-to-jailed-husband/
16 https://twitter.com/gergerliogluof/status/1354794024809463808?s=20
https://www.gercekgundem.com/guncel/247561/izmir-buyuksehir-belediyesi-deprem-yardimi-yapti-vakifbank-khk-
20 Abdullah Ayasun, For Turks, Constitutional Court No Longer an Address For Legal Remedy, Globe Post Turkey, January 16, 2018, https://turkey.theglobepost.com/constitutional-court-remedy/
21 As of October 2021, the Commission has delivered 118,415 (15,050 accepted, 103,365 rejected) decisions. The number of pending applications is 8,343. https://soe.tccb.gov.tr/