**Questionnaire for International Organizations and Civil Society by the**

**UN Special Rapporteur on the situation of human rights defenders**

**Mary Lawlor, 9 February 2021**

The UN Special Rapporteur on the situation of human rights defenders, Ms. Mary   
Lawlor invites you or your organization to respond to the questionnaire below. Submissions received will inform the thematic report of the Special Rapporteur on the issue of long-term detention of human rights defenders, which will be presented to the UN General Assembly in October 2021.

The questionnaire on the report is available at OHCHR website in English (original   
language) as well as in French, Spanish, Russian and Arabic (unofficial translations): (<https://www.ohchr.org/EN/Issues/SRHRDefenders/Pages/SRHRDefendersIndex.aspx>).

All submissions received will be published in the aforementioned website, unless you/your organization clearly indicated that you did not wish to have your input be made publicly available when submitting your response.

There is a word limit of 2500 words per questionnaire. Please submit the completed questionnaire to [defenders@ohchr.org](mailto:defenders@ohchr.org)

Deadline for submissions: **19 March 2021**

**Contact Details**

Please provide your contact details in case we need to contact you in connection with this survey. Note that this is optional.

|  |  |
| --- | --- |
| Type of Stakeholder  (please select one) | ☐ International or Inter-governmental Organisations  ⌧ Civil Society Groups or Organisations  ☐ Individual human rights defender  ☐ Academic/training or research institution  ☐ Other (please specify) |
| Name of Stakeholder/ Organization (if applicable)  Name of Survey Respondent | International Observatory of Human Rights;  The Arrested Lawyers Initiative |
| Email | [louise@observatoryihr.org](mailto:louise@observatoryihr.org) |
| Can we attribute responses to this questionnaire to you or your  organization publicly\*?  \*On OHCHR website, under the section of SR on human rights defenders. | **Yes**  Comments (if any): |

**Questions**

Human rights defenders are persons, who individually, or in association with others, work peacefully to promote and protect universally recognized human rights and fundamental   
freedoms, in accordance with the UN Declaration on Human Rights Defenders.

Defenders around the world peacefully promoting and defending human rights operate under national legal frameworks not always fully consistent with the United Nations Charter and international human rights law. In some instances, as echoed in multiple Human Rights Council and General Assembly resolutions,[[1]](#footnote-1)[1] national legislation, in particular national   
security and counter-terrorism laws, or regulations on civil society and public freedoms have been misused to target defenders in a manner contrary to international law, that might result in long-term arbitrary deprivation of liberty.

1) Do you know of any human rights defender(s) currently detained by States, who have been imprisoned on charges that carry a prison sentences of at least 10 years or more? Please provide a list of cases.

2) Do you know of any human rights defender(s) currently detained by States, who have been imprisoned on continuous sentences amounting to 10 years or more?  For example, a defender who completes a sentence of four years in detention but instead of being released is given another six year sentence? Please provide a list of cases or examples if possible.

3) Do you know of any human rights defender(s) whose time in pre-trial detention and/or   
administrative detention by States combines with a sentence that amounts, or would amount to 10 years or more? Please provide a list of cases.

4) Do you know of any human rights defender(s) falling under any of the previous categories above, who were released before ending their long-term prison sentences for any reasons (e.g. granted a pardon, as a result of an appeal, or released on humanitarian or other grounds)? Please provide a list of cases.

5) What actions do you suggest the Special Rapporteur can take to:

1. Prevent defenders from being detained for long terms in connection to their human rights work? and
2. Have those human rights defenders arbitrarily detained under long sentences released?

**NOTE**: When providing the list of cases/examples under each question, please include: the name of the human rights defender(s), a summary of their human rights work, history of   
detention (date of arrest(s), charges and conviction including articles of the relevant law(s)), a brief explanation of facts relevant to their case).

**Summary:** This submission focuses on the imprisonment of Human Rights Defenders (HRDs), specifically lawyers, in the Republic of Turkey. More than 1600 lawyers have been arrested and prosecuted while 615 lawyers have been remanded to pretrial detention. So far, 450 lawyers have been sentenced to a total of 2786 years in prison on the grounds of membership of an armed terrorism organization.[[2]](#footnote-2)

# 1) Human Rights Defenders currently detained by Turkey on long-term prison sentences

Article 314 (2) Turkish Penal Code 5237 (TPC), which criminalises membership in an armed group, does not contain a definition of what constitutes armed organizations and armed groups, nor the offense of membership. Furthermore, according to Article 220 (7) TPC, any person who aids and abets an organisation knowingly and willingly, although they do not belong to the structure of that organisation, shall also be sentenced for the offence of being a member of that organisation. The Court of Cassation has decided that the mere use of a certain bank account or secure messaging app constitutes evidence of membership of, as well as aiding and abetting a terrorist organization. Lawyers’ representation of certain clients, visiting them in prison, making statements to the press, tweeting about ECtHR cases, contacting international organizations, and criticizing state practices, have all been used as a basis for convicting lawyers. Finally, Article 5 (1) of the Anti-Terrorism Law 3713 increases the penalties of imprisonment by one half for terrorism-related offences.

According to a statement by Amnesty International, lawyers arrested in September 2020 were mainly questioned in relation to their professional activities such as the types of cases they litigate and the number of cases related to suspects alleged to have links with the Gülen movement; contractual and monetary relations with their clients; how they find their clients; the average fee charged to the clients and their professional relations with other lawyers, such as attending each other’s hearings or allocating case files to each other, implying an organizational relationship. They were also interrogated in relation to their historic mobile traffic search (HTS) records and wiretapped telephone conversations with their clients and colleagues which should have remained confidential to protect lawyer-client confidentiality.[[3]](#footnote-3)

The following list provides details of lawyers who are currently detained by the Republic of Turkey:[[4]](#footnote-4)

|  |  |  |  |
| --- | --- | --- | --- |
| **Name** | **Length of Prison Sentence** | **Date of Conviction** | **Court/District** |
| Ali Aksoy | Sentenced to 11 years and 3 months under Art 314 (2) TPC  (also convicted for insulting the president and others, amounting to a sentence of 19 years and 9 months imprisonment) | 17.07.2018 | İzmir 13th High Criminal Court |
| Barkin Timtik[[5]](#footnote-5) | 18 years and 9 months (arrested on 05.08.2017 and tortured during police custody) | 20.03.2019 | Istanbul |
| Ebru Timtik (deceased in detention on a hunger strike for a fair trial) | 13 years and 6 months | 20.03.2019 | 37th High Criminal Court of Istanbul |
| Özgür Yılmaz | 13 years and 6 months | 20.03.2019 | Istanbul |
| Fethi Ün | 12 years | 20.11.2017 | İzmir 13th High Criminal Court |
| Hurol Karadaş | 12 years | 13.03.2019 | 33rd High Criminal Court of Istanbul |
| Behiç Aşçı | 12 years | 20.03.2019 | Istanbul |
| Şükriye Erden | 12 years | 20.03.2019 | Istanbul |
| Süleyman Gökten | 10 years and 6 months | 20.03.2019 | 37th High Criminal Court of Istanbul |
| Selçuk Kozağaçlı | 10 years and 15 months | 20.03.2019 (arrested in November 2017) | Istanbul |
| Aytaç Ünsal | 10 years and 6 months | 20.03.2019 | Istanbul |
| Engin Gökoğlu | 10 years and 6 months | 20.03.2019 | 37th High Criminal Court of Istanbul |
| Ismail Kara | 12 years | November 2017 | Adana |
| Mehmet Canpolat | 12 years |  | Adıyaman |
| Ali Rıza Küçükilhan | 12 years | 20.04.2017 | Afyon |
| Nedim Saru | 11 years and 3 months | 02.06.2017 | Afyon |
| Yücel Akdağ | 10 years | 08.10.2018 | Afyon |
| Abdülkadir Aksoy | 10 years and 6 months |  | Ankara |
| Mustafa Çuhacı | 10 years | 10.07.2018 | Ankara |
| Aysel Tuğluk | 10 years | 16.03.2018 | 17th High Criminal Court of Ankara |
| Murat Uzun | 12 years |  | Eskişehir |
| Hakan Ata | 10 years |  | Eskişehir |
| İlyas Özkan | 10 years |  | Eskişehir |
| Ahmet Taktak | 10 years |  | Eskişehir |
| Şerafettin Sarıgül | 10 years | June 2017 | High Criminal Court of Kırşehir |
| Turan Canpolat | 10 years | November 2017 | 2nd High Criminal Court of Malatya, Judgement No. 2017/344 |
| Fevzi Cem Şenocak | 10 years and 6 months | 16.05.2018 (taken into custody on 15 August 2016) | 3rd High Criminal Court of Samsun, Judgement No. 2018/239 |
| Harun Kamplama | 10 years | 2019 | Şanlıurfa |
| Fevzi Kayacan (former President of the Konya Bar Association) | 10 years and 6 months | 27.10.2017 (detained on 22 July 2016) | Konya 6th High Criminal Court |
| Talip Nayir | 10 years | 21.07.2017 | Erzincan High Criminal Court |
| Mehmet Güzel (former president of Erzurum Bar Association) | 13 years 1 month and 15 days (sentence was lowered to 7 years by Appellate Court) | 10.10.2017 (arrested on 4 April 2016) | Erzurum 2nd High Criminal Court |

**Fevzi Kayacan** was the president of the Konya Bar Association from 2010 to 2016, one of the largest bar associations in Turkey. During his presidency, Kayacan led many efforts to promote human rights and democracy. Only 5 days after the failed coup attempt, detention warrants were issued for 45 members of the Konya Bar Association, including Kayacan. He was subsequently arrested on 21 July 2016, detained on 22 July and the Konya 6th High Penal Court sentenced him on 27 October 2017 to 10 years and 6 months imprisonment. Kayacan was convicted of being a member of the Fetullahist Terrorist Organization (FETÖ) under Art 314 (2) TPC, although there was no evidence related to terrorism. He was convicted for his affiliations and social contacts.

**Eren Keskin** is a human rights lawyer,[[6]](#footnote-6) co-president of the Human Rights Association (İHD), founder of the Legal Aid Bureau against Sexual harassment and Rape in Custody,[[7]](#footnote-7) an honorary member of the Paris Bar Association, the winner of multiple international awards for her peace and human rights work,[[8]](#footnote-8) including the 2018 Helsinki Civil Society Award,[[9]](#footnote-9) and was the 2018 finalist of Martin Ennals Award for Human Rights Defenders.[[10]](#footnote-10) Furthermore, Keskin was the editor-in-chief of the newspaper Özgür Gündem (‘Free Agenda’) from 2013 to 2016 and joined the “co-editor-in-chief” campaign, which was organised between May and August 2016, to support the imprisoned editorial staff of the newspaper. Özgür Gündem was shut down by the Emergency Decree no. 675 on 29 October 2016 over “terrorist propaganda” allegations. Due to her work and role at Özgur Gündem, 143 cases have been filed against Keskin.[[11]](#footnote-11)

So far, Keskin was sentenced to a total of 17.5 years in prison: On 30 March 2018, the Istanbul 2nd Criminal Court of First Instance sentenced her to 7.5 years in prison under Article 301 TCP ("degrading the Turkish nation, the Republic, institutions and organs of the state") and Art 299 TPC ("insulting the President of the Republic of Turkey").[[12]](#footnote-12) On 21 May 2019, the Istanbul 14th Heavy Penal Court convicted her under Art 7 (2) Anti-Terror Law (“propagandising for a terrorist organisation”) and sentenced her to three years and nine months in prison.[[13]](#footnote-13) On 15 February 2021, the Istanbul 23rd Heavy Penal Court sentenced her to six years and three months under Art 314 (2) TPC (“membership of an armed terrorist organisation”).[[14]](#footnote-14) These prison sentences are still pending before the Court of Appeal.

**Ebru Timtik**, human rights lawyer and member of the Progressive Lawyers’ Association was detained in September 2018. On 20.03.2019, she was convicted under Art 314 (2) TPC and sentenced to 13 years and six months. It was alleged that there is a relationship between her activities and DHKP-C, due to her representation of numerous clients accused of being DHKP-C members, participating in human rights protests, inviting clients to exercise their right to silence, or possessing books of left-wing authors.[[15]](#footnote-15) Timtik died on 27 August 2020, the 238th day of a hunger strike to protest the irregularities in her trial and to express serious concerns about judicial independence. She was transferred to hospital from Silivri Prison on 30 July following a court order which ruled against their release on health grounds. This was despite a report from the Forensic Medicine Institution which concluded that her health was not good enough to be kept in prison.[[16]](#footnote-16)

**Fevzi Cem Şenocak** is the founder of Samsun Guven Arbitration Association which focused on ensuring access to justice and efficiency of judicial mechanism but was closed under the state of emergency. He was arrested on 15 August 2016, and subsequently sentenced to 10 years and 6 months under Art 314 (1) TPC. His affiliation with FETÖ was based, inter alia, on the fact that he was using an encrypted messenger application called Bylock and attended social gatherings.

**Turan Canpolat,** a defence attorney for 21 years, was detained on 27.01.2016 after arriving at a police station representing one of his clients whose house had been searched by the police. Canpolat had recorded the violations he observed during the search. The arrest was based on statements by M.T., who had hired Canpolat as his lawyer a few days earlier, and the warrant was manipulated to make it seem as if it had been issued before his arrest. Despite being in prison during the coup attempt in July 2016, he was charged with taking part in it, which was later dropped by the prosecution. During the trial, M.T. disowned his incriminating statements. However, Canpolat was convicted to 10 years imprisonment on 20.11.2017 for representing companies that were allegedly affiliated with the Gülen movement and later shut down by emergency decrees.[[17]](#footnote-17)

Canpolat has been placed in solitary confinement in Malatya prison as it is alleged there is a high risk of him escaping. He has not been allowed visitors since the start of the COVID-19 pandemic. Canpolat has submitted several applications to the Turkish Court of Cassation in the course of the past two years, but to date has received no response to his many appeals (14 appeals have gone unanswered by the judicial authorities).[[18]](#footnote-18)

**Feti Ün** was the lawyer to Fethullah Gülen between 1990 and 1994. Ün was detained after the coup attempt on 16.11.2016 and sentenced to 12 years on 20.11.2017. The 16th Criminal Chamber of the Supreme Court of Appeals upheld the prison sentence under Art 314 (2) TPC in October 2020. He is over 70 years old and was convicted because of his representation of Gülen in the 90s.

**Talip Nayir,** board member of Erzincan Bar, was detained on 25.10.2016. He was convicted for 10 years under Art 314 (2) TPC for using the encrypted messenger application ByLock, the profile of his clients (i.e., private schools affiliated with the Gülen movement) and his social media posts.

# 2) Recommendations

**a)** For the prevention of defenders being detained for long terms in connection to their human rights work, the International Observatory of Human Rights (IOHR) and the Arrested Lawyers Initiative recommend the Special Rapporteur to take the following actions:

1. Call upon states to amend vague provisions to limit the impact of security or anti-terrorist legislation on HRDs. Broad and vague definitions of terrorism, armed organizations and armed groups, membership in such groups, or extremist activities lead to the arbitrary application of those provisions against individuals and associations promoting human rights. Therefore, there is an urgent need for state authorities to eliminate laws that enable them to sanction HRDs for critical statements, reports on human rights and providing legal representation to (alleged) perpetrators of terrorism.

*In the case of Turkey, it is suggested to amend the anti-terror legislation, including the new Anti-Terrorism Bill adopted on 25 July 2018, as well as the Turkish Penal Code as recommended by the Venice Commission,[[19]](#footnote-19) and the European Court of Human Rights,[[20]](#footnote-20) to ensure that lawyers are not identified with their client’s causes and can perform their duties in accordance with the UN Basic Principles on the Role of Lawyers.*

1. Call upon states to review their national security laws to exclude all activities in the defence of human rights. Further to ensuring specific and clear counterterrorism laws, it must be ensured that these laws entail safeguards for HRDs. Otherwise, the enacting of laws to specifically protect the work of HRD is recommended. In this regard, we encourage the Special Rapporteur to work together with the Special Rapporteur on Freedom of Expression and Opinion and the Special Rapporteur on the Promotion and Protection of Human Rights and Fundamental Freedoms while Countering Terrorism to issue guidelines on counterterrorist laws that do not impact HRD negatively.
2. Call upon all States to implement the UN “Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms” 1998 and ensure that their domestic legislation is in conformity with this declaration or transpose it directly into a national legal instrument so that HRDs can rely on it in the courts.
3. Call upon state officials and the media to refrain from stigmatizing human rights defenders as threats or enemies to the state, terrorists or criminals. Instead, state officials and the media should gather information about the work of HRDs in their country and raise public awareness of the value and legitimacy of HRD’s work. In order to change the negative perception of HRD, we ask the Special Rapporteur to provide and support training and information about the importance of protecting HRDs to prosecutors, judges and law enforcement authorities in states like Turkey, where HRDs face the highest risks.
4. Call upon all states to accept HRDs as refugees when they seek protection, and to enable fast and efficient visa processing for HRDs who are forced to relocate.
5. Call upon transnational corporations and other businesses to not cooperate with state authorities which are known for long-term imprisonment of HRDs. Moreover, they are expected to conduct “human rights due diligence” to identify, prevent, mitigate, and account for how they address adverse human rights impacts connected to their business activities. This may, for example, result from providing surveillance technology to a government that represses HRDs.

**b)** For the release of defenders being arbitrarily detained under long terms, IOHR and the Arrested Lawyers Initiative recommend the Special Rapporteur to take the following actions:

1. Publish a manual for human rights organisations for the event of the long-term imprisonment of a HDR. This should take the form of a sequence of actions that colleagues and family members of the HRD can take after the immediate arrest, as well as after the conviction, and should include guidelines on submitting the case to various international accountability mechanisms, to international NGOs or the media.

1. Recommend to those states where HRDs face the highest risks to set up a national commission for HRDs, or a parliamentary committee that oversees the situation of HRDs in the country. These national committees should work together with national human rights institutions to publicly report on HRDs being detained and should produce regular reports on long-term imprisonment of HRDs. Additionally, these committees can develop guidelines for authorities on how laws can be brought into line with the protection of HRDs. Individual members of parliament should be encouraged to advocate for individual HRD who are under long-term detention and campaign for their release.
2. Call upon all states, the media, other UN bodies as well as businesses to condemn long-term imprisonment of HRDs publicly and to speak out for individual HRD convicted to long-term prison sentences. In particular businesses should be expected to proactively use their leverage to promote respect for HRDs, to advocate against policies that restrict HRDs and to demand the release of HRDs arbitrarily detained under long terms.
3. Organize meetings with the state and HRDs in high-risk countries to discuss concerns, and to promote the Declaration on Human Rights Defenders.
4. Finally, the Rapporteur and other UN agencies should react faster to information on arbitrary detention of HRDs by increasing internal capacity and by streamlining procedures with other Special Procedures.

1. [1] See [A/HRC/RES 22/6](https://ap.ohchr.org/documents/dpage_e.aspx?si=A/HRC/RES/22/6) (2013) and [A/RES/68/181(2014)](https://undocs.org/A/RES/68/181). See also: [A/HRC/RES/25/18 (2014),](https://undocs.org/A/HRC/RES/25/18) [A/HRC/RES/27/31 (2014),](https://undocs.org/A/HRC/RES/27/31) [A/HRC/RES/32/31](https://undocs.org/en/A/HRC/RES/32/31) (2016) and [A/HRC/RES/34/5 (2017)](https://undocs.org/en/A/HRC/RES/32/31)  [↑](#footnote-ref-1)
2. The Arrested Lawyers Initiative, Mass Prosecution of Lawyers in Turkey, p. 5. Available at: <https://arrestedlawyers.files.wordpress.com/2021/01/report-2016-2021.pdf>. [↑](#footnote-ref-2)
3. Amnesty International, ‘Turkey: Politicians, lawyers, activists targeted in new wave of mass arrests’ Public Statement on 26 October 2020, Index Number EUR 44/3221/2020, at p. 4. Available at: <https://www.amnesty.org/download/Documents/EUR4432212020ENGLISH.PDF>. [↑](#footnote-ref-3)
4. This information is provided by the report from Arrested Lawyers Initiative, “Mass prosecution of lawyers in Turkey: Unjust arrests and convictions (2016-2020)”. Available at: <https://arrestedlawyers.files.wordpress.com/2020/04/rapporto-febbraio-2020-delle28099associazione-arrested-lawyers-initiative-sulla-persecuzione-di-massa-degli-avvocati-in-turchia-inglese.pdf>. [↑](#footnote-ref-4)
5. National Lawyers Guild International Committee ‘16 February 2017 Hearing – Barkın Timtik IADL Trial Observation Report’. Available at: <https://www.nlginternational.org/newsite/wp-content/uploads/2017/03/Barkin-Timtik-Trial-Observation-Report.pdf>. [↑](#footnote-ref-5)
6. Eren Keskin has defended the rights of women, prisoners and fought for justice for the families of the disappeared. See Amnesty International, ‘Turkey: “We’re not going anywhere either” – Activists pledge solidarity with prominent human rights defender’ (15 February 2021). Available at: <https://www.amnesty.org/en/latest/news/2021/02/turkey-we-are-not-going-anywhere-either-activists-pledge-solidarity-with-prominent-human-rights-defender/>. [↑](#footnote-ref-6)
7. Front Line Defenders, ‘Eren Keskin’. Available at: <https://www.frontlinedefenders.org/en/profile/eren-keskin>. [↑](#footnote-ref-7)
8. Including the Aachen Peace Award in 2004 and the Theodor Haecker Prize for Civic Courage and Political Integrity in 2005. [↑](#footnote-ref-8)
9. Netherlands Helsinki Committee, ‘Helsinki Civil Society Award 2018 Goes to Eren Keskin” (14 March 2018). Available at: <https://www.nhc.nl/helsinki-civil-society-award-2018-goes-to-eren-keskin/>. [↑](#footnote-ref-9)
10. International Federation for Human Rights, ‘Turkey: FIDH supports the human rights activist Eren Keskin’ Press Release (13 May 2019). Available at: <https://www.fidh.org/en/region/europe-central-asia/turkey/turkey-fidh-supports-the-human-rights-activist-eren-keskin> [↑](#footnote-ref-10)
11. International Federation for Human Rights, ‘Turkey: Judicial harassment of Ms. Eren Keskin’ (20 January 2020). Available at: <https://www.fidh.org/en/issues/human-rights-defenders/turkey-judicial-harassment-of-ms-eren-keskin>. [↑](#footnote-ref-11)
12. Front Line Defenders, ‘HRD Eren Keksin sentenced to 7.5 years prison’ (30 March 2017). Available at: <https://www.frontlinedefenders.org/en/case/hrd-eren-keskin-sentenced-75-years-prison>. [↑](#footnote-ref-12)
13. Front Line Defenders, ‘Eren Keskin sentenced to 3 years and 9 months in prison’ (30 May 2019). Available at: <https://www.frontlinedefenders.org/en/case/eren-keskin-sentenced-3-years-9-months-prison>. [↑](#footnote-ref-13)
14. Front Line Defenders, ‘Woman Human Rights Defender Eren Keskin Sentenced’ (18 February 2021). Available at: <https://www.frontlinedefenders.org/en/case/woman-human-rights-defender-eren-keskin-sentenced>. [↑](#footnote-ref-14)
15. Fact-finding mission on CHD’s trials (2019), at p. 8-9, 14-15. Available at: <https://eldh.eu/wp-content/uploads/2020/06/Final-Report-Fact-Finding-Mission-on-CHDs-Trials-Oct-2019-June-2020-V2.pdf>. [↑](#footnote-ref-15)
16. Front Line Defenders, ‘Human Rights Lawyer Ebru Timtik dies on hunger strike’ (28 August 2020). Available at: <https://www.frontlinedefenders.org/en/case/human-rights-lawyer-ebru-timtik-dies-hunger-strike>. [↑](#footnote-ref-16)
17. The Arrested Lawyers Initiative, ‘Persecution of a Decent Lawyer: The Case of Turan Canpolat’ (09 May 2020). Available at: <https://arrestedlawyers.org/2020/05/09/the-case-of-turan-canpolat/>. [↑](#footnote-ref-17)
18. European Parliament, Parliamentary Question E-006788/2020 on 11 December 2020. Available at: <https://www.europarl.europa.eu/doceo/document/E-9-2020-006788_EN.html>. See also ‘Request for the release of Lawyer Turan Canpolat’ by various human rights organisations (15 May 2020). Available at: <https://arrestedlawyers.files.wordpress.com/2020/05/letter-adv.-turan-canpolat.pdf>. [↑](#footnote-ref-18)
19. European Commission for Democracy through Law (Venice Commission), Opinion No. 831/2015 on Articles 216, 299, 301 and 314 of the Penal Code of Turkey (2016) CDL-AD(2016)002. Available at: <https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2016)002-e>. [↑](#footnote-ref-19)
20. European Court of Human Rights, Case of *Selahatti̇n Demi̇rtaş v. Turkey* (Application no. 14305/17), Judgement on 22 December 2020. [↑](#footnote-ref-20)