Third Party Intervention

In the Case of Mehmet Osman KAVALA v. Türkiye (no. 2), no. 2170/24, by

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An independent non-governmental organization specialized in defending and promoting freedom of expression

I. Introduction

1. İFÖD previously submitted a third-party intervention to the Chamber in the case of *Mehmet Osman Kavala v. Türkiye (no. 2)* (no. 2170/24). Following the Chamber's relinquishment of jurisdiction in favour of the Grand Chamber on 16 December 2025, the President of the Grand Chamber invited İFÖD, by letter dated 22 December 2025, to indicate the form of its participation in the subsequent proceedings. İFÖD subsequently informed the Court of its intention to submit updated written observations. The President of the Grand Chamber has firmly granted İFÖD leave to submit this updated intervention.
2. To avoid unnecessary repetition, İFÖD refers the Grand Chamber to its previous submission regarding the arguments raised therein. In summary, İFÖD argued that convicting an individual for acts already scrutinised by the European Court constitutes a violation of Article 7 of the Convention. We recalled that the Court, in its judgment in *Kavala v. Turkey* (no. 28749/18), had already thoroughly examined the evidence relating to the Gezi trial and definitively found that it failed to establish reasonable suspicion.
3. Furthermore, İFÖD submitted that the Turkish judiciary's expansive and vague interpretation of criminal statutes, most notably Article 312 of the Turkish Criminal Code (TCC) results in the arbitrary punishment of lawful acts and the legitimate exercise of Convention rights. This practice violates multiple provisions of the Convention, particularly the freedoms of expression and association, while fundamentally undermining the principle of legality. As a cornerstone of the rule of law, the principle of legality is jeopardised when criminal laws are interpreted in such an imprecise and arbitrary manner, creating a chilling effect on civil society and stifling dissent. İFÖD further emphasised that the consequences of this broad interpretation extend beyond the immediate case, weakening the protection of fundamental rights in Türkiye and the safeguards established by the Convention and the Council of Europe.
4. In this submission, İFÖD will further examine the constituent elements of the crime against the government under Article 312 of the TCC, the provision upon which the applicant's conviction and sentence of aggravated life imprisonment are founded. Given that Article 312 criminalises attempts to overthrow the government specifically through *force and violence*, it is imperative that the material and mental elements of the offence be strictly defined and consistently applied. Judicial clarity is vital to distinguish actual criminal conduct from legitimate political opposition and the exercise of constitutional rights.

II. The Offence against the Government (Article 312 of the TCC)

5. The offence against the government is regulated in Chapter 5, entitled 'Crimes against the Constitutional Order and its Functioning', under Part 4 of Book 2 of the Turkish Criminal Code (Law No. 5237). The text of Article 312 reads as follows:

> **Article 312**
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> (1) Any person who attempts to overthrow the Government of the Republic of Türkiye or to prevent it from performing its duties, in whole or in part, by means of force and violence shall be sentenced to aggravated life imprisonment.
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> (2) If other offences are committed during the commission of this offence, punishment shall also be imposed for those offences in accordance with the relevant provisions.

6. The legislative reasoning for the article explains the nature and scope of the offence as follows:

> "The text of the article defines as a separate offence any attempt to overthrow the Government, which represents the executive power among the three powers constituting the sovereignty of the Republic of Türkiye, or any attempt to partially or completely obstruct its functioning, even if not aimed at abolition [of the constitutional order]. In this definition, the acts of attempting to overthrow the Government, or to obstruct its duties, are punished as a completed offence.
>
> For other matters relating to the application of the provision, reference should be made to the reasoning for the provisions concerning Violation of the Constitution (Article 309) and Offences against the Legislative Body (Article 311)."

7. The offence against the government is closely related to other offences against the constitutional order and its functioning. Article 309 governs the offence of attempting to overthrow the constitutional order, while Article 311 governs the offence of attempting to overthrow the legislative body.

8. The legislative reasoning for Article 309 is particularly instructive regarding Article 312. It highlights the centrality of the element of force and explicitly requires that the force employed must be capable of achieving the intended result:

> "Since the term 'those who attempt' is used as the material element in the article, attempting to abolish the order envisaged by the Constitution, to replace this order with another, or to prevent the actual implementation of this order is sufficient for punishment. As the offence can be committed by both those who govern and those who are governed, the suitability [capability] required for the attempt must be assessed by the judge. This assessment must take into account the manner in which the offence was committed and, in particular, the fact that the offence is one of endangerment, and whether the coercion or threat used was suitable for achieving the result."

III. Elements of offence against the Government (Article 312 of the TCC)

A. Protected Legal Value

9. The primary objective of this offence is to protect the Government's ability to discharge its duties in accordance with constitutional rules. Prior to the 2017 constitutional amendments in Türkiye, the "Government", specifically the Council of Ministers constituted the executive branch. However, following the transition from a parliamentary to a presidential system, the Council of Ministers was abolished. Executive power is now vested solely in the President, exercised in accordance with the Constitution and the law (Article 8 of the Constitution). Given that the Turkish Criminal Code (TCC) contains a specific provision protecting the President (Article 310), the continued applicability of Article 312 in the post-2017 constitutional landscape is a matter of legitimate legal debate.

10. One doctrinal view posits that the legal interest protected by this offence is the will of the electorate. By penalising offences against the government, the law aims to safeguard the

democratic mandate of the Republic of Türkiye. On this basis, it is argued that Article 312 remains applicable despite the structural changes to the executive.[1]

11. Conversely, it is argued that since the Government is a constitutional organ, the legal value protected by this crime is identical to that of the offence of violating the Constitution (Article 309), distinguished only by the specific subject of the attack. This raises the question of whether a single act can constitute two separate offences. Indeed, following the coup attempt of 15 July 2016, prosecutions were initiated concurrently under Articles 309 and 312. However, the Court of Cassation ruled that proceedings should be conducted solely under Article 309, rejecting the necessity for separate trials or sentencing under Article 312.[2] The General Assembly of Criminal Chambers of the Court of Cassation held that:

> "Where all elements of the offence of violating the Constitution are present, defendants shall not additionally be punished for offences stipulated in Articles 311 and 312 of the Turkish Criminal Code, which protect the same legal values."

12. Under this jurisprudential approach, a distinction is drawn based on the gravity of the result: if the Cabinet's decision-making or functioning is obstructed by force and violence without an attempt to overthrow the entire constitutional order, the act falls under Article 312. However, if the act aims to change the constitutional order itself, Article 309 absorbs the offence, and no separate conviction under Article 312 is required.

B. *Actus Reus* (Material Element)

13. The *actus reus* of the offence against the government consists of "attempting to overthrow the Government of the Republic of Türkiye or to prevent it from performing its duties, in whole or in part, by means of force and violence". Consequently, the defining element of this offence is the employment of "force and violence". It is significant to note that while the initial draft of the provision proposed the phrase "force or threat" (*cebir veya tehdit*), this was amended to "force and violence" (*cebir ve şiddet*) during parliamentary committee deliberations. This amendment was explicitly justified on the grounds that "rights exercised within the scope of freedom of expression and association should not be considered within the scope of this offence".[3]

14. Article 312 defines a crime of attempt; therefore, the actual overthrow of the government is not required for the offence to be consummated. The attempt itself is sufficient. A crime unfolds through a process known as the *iter criminis* (path of crime), which begins with preparatory acts and progresses to executive acts. For criminal law to intervene, it is not sufficient for an individual merely to possess the intent and will to commit a crime; this intent must manifest in conduct of a certain quality and magnitude.[4] Crucially, mere preparatory acts are not punishable in relation to this offence. The critical legal threshold is the commencement of execution. For the crime defined in Article 312 to be committed, that

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1 ÖZATA Muhammed Hakan / TAŞ Burak, "Cumhurbaşkanlığı Hükümet Sistemi Kapsamında Hükümete Karşı Suç (TCK m. 312)", SÜHFD., C. 30, S. 1, 2022, s.456.

2 Yargıtay Ceza Genel Kurulu, E. 2022/299, K. 2022/484, K.T. 29.06.2022.

3 Z. Yılmaz, Gerekçe ve Tutanaklarla Yeni Türk Ceza Kanunu, Ankara, 2004, Seçkin Yayınevi, s. 370

4 A. Gözel, "TCK Madde: 312 'Hükümete Karşı Suç' Tipinin İncelenmesi ve Yargıtay Kararları", academia.edu.

is, for the conduct to qualify as a punishable attempt, the perpetrator must have passed beyond the stage of preparation and initiated the execution of the crime.

15. However, a critical qualification applies: the acts in question must involve force and violence sufficient to overthrow the Government or obstruct its functioning. The legislative reasoning for Article 108 of the TCC defines force or coercion (*cebir*) as "the use of physical force against a person to exert a coercive influence on their will and behaviour, or that of a third party". Under this definition, the individual subjected to coercion is compelled to engage in specific conduct as a direct result of the physical pain inflicted. Essentially, the victim is forced to perform certain actions because their will is negated by the effect of this pain.

16. As the consummation of the offence does not require the actual overthrow of the Government, it is classified as an **offence of endangerment** (*tehlike suçu*). Furthermore, the requirement that the acts must be *suitable* (capable of producing the result) renders this specifically a **concrete endangerment offence** (*somut tehlike suçu*). For a crime of concrete endangerment to be established, the act must have posed a real, verifiable risk of harm—a concrete danger—to the legal value protected by the statute.[5] In such offences, the existence of danger cannot be presumed or based on abstract assumptions; the court must conduct a specific inquiry to determine whether the act in question actually created a possibility of harm given the specific circumstances of the case.[6]

17. In the context of the offence against the Government, the violence employed must be **capable**, at a minimum, of obstructing the Government's activities. This implies that the acts must be of sufficient gravity, and the means employed must be appropriate to generate a tangible risk of overthrowing the Government or, at the very least, impeding its functions. The assessment of this **suitability** within the context of an attempt is a judicial function, requiring a specific evaluation of the manner in which the crime was perpetrated.

18. As highlighted in İFÖD's previous submission, the Court of Cassation introduced the controversial concept of "moral force" (*manevi cebir*) in its *Sledgehammer* (*Balyoz*) judgment. In that case, the 9th Criminal Chamber adopted an expansive interpretation of "force and violence", ruling that the offence could be committed through moral force, provided such force exerted a coercive impact sufficient to achieve the perpetrator's aim. The Chamber reasoned that "force" should not be construed narrowly as mere physical force; rather, it encompasses actions manifesting an unlawful will to achieve illegal ends through coercion, which may extend to moral or psychological pressure. This interpretation significantly broadened the definition of force to include actions implying a clear intent to deploy physical force, even where such force was not immediately manifest.[7]

19. While the *Sledgehammer* precedent suggested that "moral force" might satisfy the *actus reus* of the offence, the **concept remains legally precarious and doctrinally ambiguous**. In *Sledgehammer*, the defendants were high-ranking military officers. Given their direct command over weaponry and troops, the threat of force was credible, and the inference that moral pressure could swiftly translate into physical execution was at least plausible.

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5 U. Ersoy, "Ceza Hukukunun Gri Alanı: Tehlike Suçları", TAAD, Yıl: 11(41), January 2020.
6 *Ibid*., p. 35
7 9th Criminal Chamber of the Court of Cassation, E.: 2013/9110, K.: 2013/12351, T.: 09.10.2013.

20. Crucially, this expansive interpretation faced widespread criticism from legal scholars[8] and has not been subsequently relied upon by the Court of Cassation to establish precedent. Indeed, a close examination of the decision of the 3rd Criminal Chamber in the present case[9] reveals a shift in reasoning: the Chamber proceeded on the premise that the applicant had exerted **physical** violence. This reliance on a finding of physical violence implicitly acknowledges that, for a civilian defendant lacking military command, the concept of "moral force" is insufficient to sustain a conviction under Article 312.

C. *Mens Rea* (Mental Element)

21. The *mens rea* of the offence against the government is twofold, requiring both general intent and a specific criminal purpose (*saik*). The offence can only be committed intentionally; liability for negligence is categorically excluded. Intent establishes the essential mental link between the perpetrator, their conduct, and the resulting consequence. To satisfy this element, the perpetrator must not only be aware of the factual elements of the crime, specifically the use of force, but must also wilfully direct their actions toward the prohibited outcome. Crucially, this intent must encompass the employment of coercion and violence. The perpetrator must act with the specific purpose of overthrowing the Government of the Republic of Türkiye or preventing it, in whole or in part, from performing its duties.

22. Consequently, to sustain a conviction under Article 312, the judicial authorities must prove beyond reasonable doubt that the perpetrator resorted to force and violence with the specific and exclusive intention of overthrowing the Government.

IV. İFÖD's Evaluation

23. The central legal determination in this case is whether the applicant's actions, which form the subject of the criminal proceedings, can legally constitute an "attempt to overthrow the government" or prevent it from performing its duties through **force and violence**. In this context, the Grand Chamber is called upon to scrutinise whether the domestic courts reasonably demonstrated, with reference to concrete evidence, that the *actus reus* and *mens rea* of the offence were established.

24. As detailed in İFÖD's previous submission, the European Court has already rigorously examined the evidence presented in the indictment during the case of *Kavala v. Turkey* (no. 28749/18). In those proceedings, the prosecution characterised the Gezi events as a conspiracy orchestrated from behind the scenes by a group of influential civil society figures. According to this narrative, this group formed a "*sui generis* structure" in Türkiye, led by the applicant and supported by foreign actors, most notably an American businessman. The prosecution alleged that the applicant directed this criminal association, secretly coordinating various civil society actors to plan and incite an insurrection against the Government.

25. Predicated on this conspiratorial narrative, the prosecution listed numerous actions purportedly carried out by this "*sui generis* structure," linking them in a vague and unsubstantiated manner to the alleged objective of overthrowing the Government by force. However, the Court found that the facts attributed to the applicant, which formed the basis

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[8] E. Yetkin, "Yargıtay'ın Gezi Parkı Davası Kararının Değerlendirilmesi", Hukuk Defterleri, No. 40, 2024, pp 54-61.

[9] 3rd Criminal Chamber of the Court of Cassation, E.: 2023/12611, K.2023/6359, T: 28.09.2023

of his interrogation and the subsequent charges, consisted entirely of lawful activities, isolated acts unrelated to any criminal design, or conduct clearly protected under the Convention. Crucially, the Court determined that **all** of these activities were non-violent (§§ 145-146).

26. The Court scrutinised the evidentiary basis relied upon by the domestic authorities to justify the applicant's detention. This evidence comprised: the testimony of a witness (M.P.); intercepted telephone conversations with journalists, publishers, and civil society organisers during and after the Gezi events; meetings with diplomats and NGO leaders; and message exchanges on various unrelated topics. It also included discussions regarding a visit by a delegation from the European Union Türkiye Civic Commission (EUTCC) in 2017—an event occurring long after both the Gezi protests and the attempted coup. Finally, the authorities cited the applicant's acquaintanceship with H.J.B., an American academic (§ 147).

27. The Court definitively concluded that this evidentiary file contained no specific facts or information capable of giving rise to a reasonable suspicion justifying the applicant's initial or continued detention under Articles 309 and 312 of the TCC (§§ 152-155). The Court emphasised that a suspicion of attempting to overthrow the constitutional order or government by force and violence must be grounded in concrete and verifiable facts. However, neither the initial detention order nor the subsequent extensions contained such evidence. The Court discerned no causal link between the suspicions alleged and the material presented as "evidence" in the investigation file. Indeed, the majority of the evidence cited against Mr Kavala was deemed irrelevant to the offences charged. Crucially, the Court held that the detention measures were "essentially based not only on facts which could not reasonably be regarded as conduct criminalised under domestic law, but also on facts largely related to the exercise of Convention rights" (§ 157).

28. Consequently, the Court found violations of Article 5 §§ 1, 3, and 4 of the Convention. Most significantly, the Court determined that the extended detention of the applicant, a prominent human rights defender, was pursued with the ulterior purpose of silencing him. Accordingly, the Court found a violation of Article 18 taken in conjunction with Article 5 § 1, marking a definitive recognition of the political motivation behind the proceedings (§§ 224, 226, 228, and §§ 230-232).

29. Nevertheless, the domestic courts, namely the Istanbul 13th Assize Court, the 3rd Criminal Chamber of the Istanbul Regional Court of Appeal, and the 3rd Criminal Chamber of the Court of Cassation, **uncritically endorsed the indictment's narrative**. Consequently, they convicted the applicant and his co-defendants of attempting to overthrow the Government, sentencing Mr Kavala to aggravated life imprisonment.

30. The 3rd Criminal Chamber of the Court of Cassation concluded that the constituent elements of force and violence required for the offence against the government were present in the context of the Gezi Park protests. The Chamber grounded this conclusion on the following reasoning: **a**. It relied on an incident where a group of demonstrators, having gathered in front of the Prime Ministry's office to clash with law enforcement officers protecting the area, utilised a seized construction vehicle. Accordingly, the Chamber accepted this as proof that force and violence were effectively directed against the Government. **b**. The reasoned decision asserted that members and supporters of "marginal groups, always ready to take action" were involved in the protests to create an environment of chaos. It further alleged

that these groups utilised various terrorist organisations known to the public to supply the necessary element of violence. **c**. Consequently, the Chamber accepted that certain consequences arising during the protests constituted "serious actions" and "acts of coercion and violence aimed at overthrowing the existing government" within the meaning of Article 312 of the Turkish Criminal Code.[10]

31. The 3rd Criminal Chamber accepted that the applicant had participated in the organisation, planning, and direction of the Gezi Park protests, thereby managing and financing the events. Simultaneously, the co-defendants in the same proceedings, Can Atalay and Tayfun Kahraman, were found to have carried out activities related to the initiation and nationwide expansion of the protests, acting in coordination with the applicant. Consequently, all three defendants were held criminally liable under Article 312 of the Turkish Criminal Code.

32. Serious questions arise regarding the foreseeability of this conclusion by the Court of Cassation. It has been vigorously argued that the decision failed to present concrete evidence establishing a causal link between the violent events in question and the defendants' specific actions. Indeed, this lack of causality was recently confirmed by the Constitutional Court itself. In the individual application filed by **Tayfun Kahraman**, who was tried and convicted in the same proceedings as the applicant, the Constitutional Court examined the complaints regarding the right to a fair trial and ruled that there had been a violation.[11]

33. The Constitutional Court explicitly criticised the lower courts for merely reciting social media posts and press statements, labelling them "generally provocative" without further legal analysis. Crucially, the courts failed to identify *which* specific posts directly incited violence or evidenced an attempt to overthrow the Government by force. The causal link between the applicant's expression and the alleged violence was completely absent from the judicial reasoning. Consequently, it remained obscure exactly which words were deemed inflammatory, or what specific violent incidents were allegedly triggered by these statements. Furthermore, regarding the allegation that the applicant coordinated films and documentaries to "shape global perception" of the Gezi events, the court offered no explanation as to the nature of these perceptions or how they constituted a criminal act. Ultimately, the Constitutional Court concluded that the decision failed to demonstrate any active role played by the applicant in the occurrence of the violent incidents.[12]

34. The Constitutional Court acknowledged that whilst violent incidents, some resulting in injury and death, did occur during the Gezi Park protests, the conviction was fatally flawed due to the absence of any concrete evidence linking the defendants to these acts. In a critical passage, the Court held:

> "Indeed, serious violent incidents occurred in some places during the events at Gezi Park... However, the mere existence of violent incidents that occurred during an ongoing meeting and demonstration is **not sufficient to hold individuals directly responsible unless a causal link can be established between their actions and these violent incidents.** Courts must clearly state in the grounds for their convictions what actions of

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10 E. Yetkin, "Yargıtay'ın Gezi Parkı Davası Kararının Değerlendirilmesi", Hukuk Defterleri, No. 40, 2024, p. 55.

11 *Tayfun Kahraman* [GK], B. No: 2023/98215, 31/7/2025.

12 *Ibid*., § 49.

> the defendant can be characterised as an attempt to overthrow the government through the use of force and violence. Where such actions are not clearly demonstrated, it is not possible to assess whether the grounds for the conviction are sufficient."[13]

35. Consequently, the Constitutional Court arrived at the definitive conclusion that "no concrete link can be established between the actions attributed to the applicant by the court and the existing evidence on which the conviction is based."[14]

36. The Constitutional Court further dismantled the domestic courts' central thesis: that the defendants operated under a pre-meditated conspiratorial scheme. Exposing the evidentiary void underpinning this assertion, the Court reasoned:

> "One of the grounds for the conviction is that the applicant and some of the defendants acted as part of a plan and organisation prior to the Gezi Park events. However, it is not clear from the decision what exactly led the Court to this conclusion. Looking at the communication records... it appears that prior to the Gezi Park events, he communicated with only one of the other defendants... (notably, a person who has been acquitted of the charges in the current trial...). Again, there is no information in the decision regarding the content or frequency of this communication. Therefore, the only evidence available... to reach the conclusion that the events were planned in advance... is the communication with [this single] defendant... However, it does not appear possible to say that this finding alone is sufficient to conclude that the applicant acted as part of a premeditated plan."[15]

37. Finally, the Constitutional Court remained unconvinced by the allegation that the defendants orchestrated the violent incidents during the Gezi Protests. In dismantling the lower courts' theory regarding the so-called "Park Forums", the Court observed:

> "In addition, the court of first instance and the Court of Cassation stated that the applicant [Mr Kahraman] participated in meetings held at regular intervals throughout Turkey under the name of Park Forums/Forum Coordination... and that M.O.K. [Mr Kavala], who was considered the principal perpetrator, coordinated these forums through the applicant via another defendant... However, the aforementioned assessment does not clarify when the applicant specifically participated in which forum meetings, what kind of decisions were taken at these meetings, the impact of the decisions taken on the violent incidents, and, in particular, the link between the organisation of these forums and the violent acts that occurred. Moreover, the decisions do not sufficiently assess what concrete relationship between the applicant and M.O.K. ... would make it possible to establish a connection with the aforementioned forum activities. Consequently, the manner in which the alleged acts gave rise to the applicant's criminal liability has not been sufficiently substantiated in this regard."[16]

38. In the *Tayfun Kahraman* judgment, the Constitutional Court applied an objective test to determine whether the offence under Article 312 of the TCC could arguably be said to have been committed by the defendants during the Gezi events. These findings are of paramount importance to the present proceedings, not merely because the underlying facts are identical,

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13 *Ibid*., § 50.
14 *Ibid*., § 51.
15 *Ibid*., § 54.
16 *Ibid*., § 55.

but because they establish the definitive domestic legal standard for the crime of attempting to overthrow the Government. As elucidated by the Constitutional Court, a conviction under this provision requires a **demonstrable causal link** between the defendants' specific conduct and the actual acts of violence. Furthermore, the violence itself must be of such gravity as to genuinely threaten the existence of the Government. The Constitutional Court confirmed that the involvement of dissatisfied segments of society in sporadic acts of violence during protests fails to meet the high threshold required for this offence. To hold otherwise would fundamentally negate the right to freedom of assembly and demonstration.

39. İFÖD submits that the Grand Chamber should accord significant weight to the Constitutional Court's findings in *Tayfun Kahraman*. These findings conclusively demonstrate that the domestic courts' interpretation and application of Article 312 in the *Kavala* case were neither foreseeable nor compatible with the principle of *nullum crimen sine lege*.

V. Conclusion

40. Supplementing its previous submissions, İFÖD contends that the Turkish judiciary's expansive and amorphous interpretation of Article 312 of the TCC results in the arbitrary punishment of lawful conduct and the exercise of Convention rights. This judicial practice violates fundamental freedoms, including those of expression and association and flagrantly breaches the principle of legality.

41. The principle of legality, the bedrock of the rule of law, is eroded when criminal statutes are applied with such imprecision, generating a profound chilling effect on civil society and stifling dissent. This broad interpretation has ramifications far beyond the immediate case; it weakens the entire framework of fundamental rights protection in Türkiye and undermines the safeguards established by the Council of Europe. By failing to establish a causal link between the applicant's actions and the alleged violence, the domestic courts have effectively created a crime by analogy, rendering the law unforeseeable.

42. Consequently, İFÖD respectfully invites the Grand Chamber to scrutinise the *Tayfun Kahraman* judgment of the Constitutional Court as a critical reference point for the domestic standard of foreseeability. A ruling by this Court that reaffirms the necessity of strict adherence to the principle of legality is indispensable for curbing these systemic violations and ensuring the effective protection of Convention rights in Türkiye. Furthermore, the total absence of a causal link, as identified by the Constitutional Court, serves as definitive proof that the restrictions imposed on the applicant, affecting his rights under Articles 5, 6, 7, 10, and 11 were not pursued for any legitimate legal aim. Rather, they were driven by the ulterior purpose of silencing him and stifling civil society, in violation of Article 18 taken in conjunction with these provisions.

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