



Date: 2 March 2025

Security Studies and Rule of Law Association (SRL Swiss)

15 rue des Savoises

1205 Genève, Switzerland

State Secretariat for Migration (SEM)

Subject: The Maydanoz Döner Investigation and Concerns Regarding Discrimination Against Persons Dismissed by Emergency Decree-Laws (KHKs)

To Whom It May Concern,

SRL Swiss submits this note to draw attention to the possible human-rights and asylum-relevant implications of the criminal investigation concerning the Maydanoz Döner restaurant chain and, in particular, to the way in which employment, commercial and social relationships involving persons dismissed from public service under emergency decree-laws have been treated in public statements and investigative measures.

1. Background

The source report states that Maydanoz Döner was established in 2018 under Somca Gıda and expanded rapidly across Türkiye. Publicly reported information indicates that, on 21 February 2025, the Antalya Chief Public Prosecutor's Office coordinated a large-scale operation concerning alleged financing of the organization referred to by Turkish authorities as "FETÖ."

The initial public announcement referred to 353 suspects apprehended in an operation centred in Antalya and conducted across 31 provinces. Subsequent reporting dated 24 February 2025 stated that the operation had expanded to 32 provinces and 372 persons, of whom 126 were remanded in custody, 156 were released subject to judicial-control measures, and 90 were released by police or prosecutors. A trustee was also appointed in relation to the company.

2. Nature of the Allegations and Evidentiary Concerns

Public statements by the authorities described the investigation as concerning an alleged financial structure operating through a restaurant chain. The source report, however, emphasizes that employment and partnership relationships with persons dismissed under KHKs were treated as incriminating circumstances and contends that the individualized criminal basis for a number of measures was not made sufficiently clear.

The source report also refers to a Financial Crimes Investigation Board (MASAK) analysis concerning transactions of approximately TRY 220 million between the company and KHK-dismissed persons. The report does not reproduce the underlying MASAK document or explain which transactions were alleged to constitute criminal conduct. For publication purposes, this point should therefore be presented as a reported investigative allegation rather than as an established fact.

3. Human-Rights and Non-Discrimination Concerns

The criminal law must be applied on the basis of individualized conduct and evidence. Employment of a person, family relationship, lawful social contact or ordinary commercial activity cannot, without additional elements capable of establishing the constituent elements of an offence, substitute for individualized proof of criminal responsibility.

The source report describes the cumulative social and economic effects experienced by many persons dismissed under KHKs, including difficulty obtaining employment, exclusion from commercial relationships and concern among employers that hiring such persons may attract investigative scrutiny. These concerns engage, depending on the facts of each case, principles of non-discrimination, respect for private life and social identity, and the right to work recognized in international human-rights instruments.

4. Relevance to Asylum and Protection Assessments

The Maydanoz Döner investigation may be relevant in protection procedures insofar as it forms part of the factual context relied upon by applicants to demonstrate stigmatization, restrictions on economic participation, or adverse treatment associated with KHK status or perceived affiliation. Any such claim should be assessed individually and on the basis of up-to-date country-of-origin information.

SRL Swiss respectfully requests that the circumstances described above be considered, where relevant, in the assessment of applications submitted by KHK-dismissed persons and their family members who seek protection in Switzerland.

Respectfully submitted,

Board of Directors

Security Studies and Rule of Law Association

This document records and analyses allegations and source material available to SRL Swiss. Unless otherwise stated, it does not purport to determine individual criminal liability; disputed factual assertions are presented as allegations or attributed statements.

Selected Sources and Verification Materials

- Anadolu Agency, 21 February 2025: initial official announcement concerning “Kıskaç-40” (353 suspects; 31 provinces).
- Anadolu Agency, 24 February 2025: updated figures (372 persons; 32 provinces; 126 remanded in custody).