



PERMANENT MISSION OF THE REPUBLIC OF TÜRKİYE  
TO THE UNITED NATIONS OFFICE IN GENEVA

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The Permanent Mission of the Republic of Türkiye to the United Nations Office in Geneva and other International Organizations in Switzerland presents its compliments to the Office of the High Commissioner for Human Rights and with reference to the Communication from Special Procedures dated 12 May 2023 (AL TUR 2/2023), has the honour to enclose herewith the observations provided by relevant Turkish authorities.

The Permanent Mission of the Republic of Türkiye avails itself of this opportunity to renew to the Office of the High Commissioner for Human Rights the assurances of its highest consideration.

Geneva, 14 August 2023



Encl: As stated.

**Office of the High Commissioner for Human Rights**  
**Palais des Nations**  
**1211 Geneva 10**

**INFORMATION NOTE IN REPLY TO THE JOINT COMMUNICATION FROM  
THE SPECIAL PROCEDURES**

**(Reference: AL TUR 2/2023)**

1. With reference to the joint communication of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression; Working Group on Arbitrary Detention; Special Rapporteur on the rights to freedom of peaceful assembly and of association; Special Rapporteur on the situation of human rights defenders; Special Rapporteur on the independence of judges and lawyers and Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism dated 12 May 2023, the Government of the Republic of Türkiye (hereinafter, “the Government”) would like to submit its responses and observations hereinbelow.

**I. OVERVIEW**

2. The Republic of Türkiye is a democratic state governed by the rule of law, respecting human rights and fundamental freedoms as stated in Article 2 of its Constitution. It is a founding member of the United Nations and the Council of Europe.
3. The Constitution imposes positive obligations upon the State to ensure the welfare, peace and happiness of the people and the society, to protect the Republic and democracy, and to remove the obstacles that limit fundamental rights and freedoms. As a requirement of its positive obligations, the State takes the necessary measures to protect its people from terrorism.
4. Türkiye carries out its fight against terrorism within the framework of the Turkish Constitution and the relevant national legislation and in compliance with the fundamental principles and rules of international law. In this context, national authorities are actively and resolutely combatting, in accordance with the rule of law and with due regard to the principles of necessity, proportionality and non-discrimination, the terrorist organizations that threaten national security and the public order by targeting civilians as well as security forces.
5. The PKK terrorist organization, erroneously referred to as “the Kurdistan Workers Party” in the joint communication, which Türkiye has been fighting for 40 years is an

armed terrorist organization committing murder and injuries towards civilians including women and children, soldiers and police; robbery, extortion, latrocination, raiding villages and police stations and arson along with many other illegal activities such as money laundering, arms, human and drug trafficking. In many countries worldwide as well as the European Union since 2002, the PKK is listed as a terrorist organization.

6. Türkiye's counter-terrorism legislation has been revised and updated in line with international standards, taking into consideration the delicate balance between protecting national security and public safety and order on the one hand, and safeguarding freedom of expression and press on the other.
7. Freedom of the press, which is a manifestation of the freedom of expression, constitutes one of the indispensable elements for a democratic society. The Republic of Türkiye is committed to protect and further strengthen its democracy in conformity with international law and standards and in line with this commitment, meticulously safeguards freedom of expression and press activities.
8. Notwithstanding the foregoing, human rights and fundamental freedoms are not absolute, and the limitations that may be imposed on these rights and freedoms in a democratic country are set out in international law, and duly reflected in the Turkish Constitution and relevant legislation.
9. No one has the privilege of committing crimes in a State governed by the rule of law. Persons may be subject to investigation or prosecution for acts that are considered criminal (such as membership in a terrorist organization), even if they are or claim to be journalists. It is important to note that no individual is subject to investigation or prosecution for their journalism activities in Türkiye.
10. Investigations and prosecutions are carried out by independent and impartial prosecutors and courts in line with the jurisprudence established by international courts and human rights mechanisms, notably the European Court of Human Rights.

## **II. FACTS AND OBSERVATIONS**

11. Since the legal proceedings concerning the matter raised in the joint communication have not been finalized yet, the Government would like to convey its comments below without prejudice to any potential outcome of the ongoing legal process.

*On the factual and legal grounds for the operation:*

12. Based on the concrete information obtained on the individuals who operate within the PKK/KCK terrorist organizations' structure and on structures established under the name of media organizations to promote the terrorist organizations' ideologies, Diyarbakır Provincial Public Prosecutor's Office initiated the investigation referred to in the joint communication. In this context, it should be highlighted that it is the public prosecutor's legal duty to immediately investigate the factual truth, in order to make a decision on whether to file public charges or not, as soon as informed of a fact that creates an impression that a crime has been committed, either through a report of crime or through any other manner.
13. Furthermore, it should be underlined that the concerned investigation is still pending before Diyarbakır Public Prosecutor's Office and all procedural acts in the investigation stage are confidential pursuant to Article 157 of the Criminal Code of Procedure (CCP) due to the ongoing collection of evidence.
14. The concerned investigation has been conducted in line with rules and procedures prescribed in the CCP, which has been equipped with the fundamental safeguards provided by the Turkish Constitution and international human rights law.
15. According to the Constitution, fundamental rights and freedoms may be restricted only by law and in conformity with the reasons mentioned in the relevant articles of the Constitution without infringing upon their essence. These restrictions shall not be contrary to the letter and spirit of the Constitution, the requirements of the democratic order of the society and the secular nature of the Republic and shall be applied with due regard to the principle of proportionality.
16. The Constitution recognizes all fundamental rights and freedoms, including the right to effective remedy and the right to personal liberty and security. On the latter, Article 19 of the Constitution stipulates in a clear, predictable and understandable manner under what circumstances a person may be deprived of his/her freedom. On the other hand, the CCP, in accordance with the European Convention on Human Rights (ECHR) and the International Covenant on Civil and Political Rights (ICCPR), has determined the principles and procedures by which investigation and prosecution need to be conducted.
17. Detention, as regulated in Article 91 and consequent articles of the CCP, is the temporary restriction of the liberty of the apprehended person in a way that does not harm his/her health, within the legal period before he/she is brought before the

competent judge or released, in order for proceedings against him/her to be completed. The detainees have rights such as the right to be informed of the crime attributed to him/her and of his/her rights, the right to remain silent, the right to appoint a defense counsel, the right to present evidence and to request the collection of evidence in his/her favor, the right to be immediately brought before a judge, the right to appeal against the detention decision and the right to request a medical examination by a doctor.

- 18.** The individual who has been detained, his/her defense counsel or legal representative, his/her spouse or a blood relative of first or second degree may file a motion with the Magistrates' Court against the act of apprehension, or against the written order by the public prosecutor on taking the individual into custody or on the extension of the custody period, requesting an immediate release from custody. As per the law, the motion of the detainee is brought to the attention of the judge immediately. Likewise, any release decision rendered upon appeal shall be enforced immediately.
- 19.** The measure of arrest, regulated in Article 100 of the CCP, is implemented in specific circumstances for the purpose of conducting an effective and lawful criminal procedure.
- 20.** Article 100 of the CCP states that if there are facts which point to the existence of strong suspicion of a crime and any of the "grounds for arrest" are present, an arrest warrant against the suspect or accused may be rendered. If the suspect or accused has fled, eluded justice or if there are specific facts which justify the suspicion that he/she may flee, it can be considered that there is a ground for arrest. Destructing, hiding or tempering with the evidence is also listed among grounds for arrest.
- 21.** Pursuant to Article 101 of the CCP, during the investigation phase, upon the motion of the public prosecutor, the Magistrates' Court shall issue an arrest warrant for the suspect, and during the prosecution phase, the trial court shall issue an arrest warrant for the accused upon the motion of the public prosecutor or by its own motion.
- 22.** The suspect or accused can appeal against the arrest warrants in accordance with Articles 101, 104, 105, 267 and 268 of the CCP. In Article 101/5, it is stated that decisions taken pursuant to Articles 100 and 101 are subject to objection, and according to Article 104, the suspect or accused is entitled to file a motion of release at any stage of the investigation and prosecution. Moreover, in Article 108, it is laid down that during the investigation phase while the suspect is in detention, and at regular intervals not exceeding 30 days each, an evaluation on whether the continuation of the arrest is necessary or not shall be conducted by the Magistrates' Court upon the motion of the public prosecutor or the suspect; Article 100 of the CCP shall apply during this

evaluation. Once the suspect is formally accused, the judge or the trial court on their own motion shall evaluate the status of the accused who is in detention on each trial or, if the conditions necessitate, between the trial days, or within the time limits foreseen in the first paragraph of the Article as explained above, and decide whether it is necessary for the detention to continue.

- 23.** Article 116 of the CCP regulates the search that may be undertaken related to the suspect or the accused. According to this Article, in cases where there is reasonable doubt that he/she may be arrested without a warrant, or evidence of the crime may be obtained, a body search and a search of the belongings, or a search in the dwelling, business place and other premises of the suspect or the accused may be conducted. Article 119 of the CCP stipulates that members of the security forces can conduct searches upon an order of the judge; or, if there is peril in delay, upon a written order of the public prosecutor; and if the public prosecutor is not reachable, upon a written order of the superior security force member in charge.
- 24.** Pursuant to Article 127 of the CCP, seizures may be conducted upon a decision of the judge or, if there is peril in delay, upon the written order of the public prosecutor, and in cases where it is not possible to reach the public prosecutor, upon the written order of the superior security force member in charge. Where a seizure is made without a warrant by a judge, the seizure shall be submitted within 24 hours to the judge who has jurisdiction for his/her approval. The judge shall reveal his/her decision within 48 hours from the act of seizure; otherwise the seizure shall be automatically void.
- 25.** Attorneys' offices shall only be searched with a court decision and in connection with the conduct that is indicated in the decision and under the supervision of the public prosecutor. The President of the relevant Bar or an attorney representing him/her shall be present at the time of the search. If the attorney whose office is searched or the president of the Bar or the attorney representing him/her objects to the search in respect to the items to be seized at the end of the search, by alleging that those items are related to the professional relationship between the attorney and his/her client, then those items shall be placed in a separate envelope or a package and sealed by the individuals present, in order for the Magistrates' Court or the judge in the investigation phase, and the trial court in the prosecution phase to give the necessary decision on this matter. If the competent judge/court establishes that the seized items are under the privilege of attorney-client relationship, the seized objects shall be promptly returned to the attorney and the transcripts concerning the seizure and related acts shall be destroyed.

26. In the extensive investigation being conducted by Diyarbakır Public Prosecutors' Office, due to the ongoing collection of evidence and the large number of suspects, custody orders have been taken and the measures related to protection of evidence in the CCP have been implemented by the Diyarbakır 3rd Magistrate Court in order to complete the investigation phase. Arrest decisions and other judicial control measures have been rendered against the suspects regarding whom there is strong suspicion of having committed a crime. However, it must be stressed that the Public Prosecutor's Office released some of the suspects, assessing the conditions of each of them and taking into account the status of present evidence.

Regarding the measures taken to ensure a safe and enabling environment for Presidential and Parliamentary Elections:

27. Article 67 of the Constitution titled "Right to vote, to be elected and to engage in political activity" regulates that "*In conformity with the conditions set forth in the law, citizens have the right to vote, to be elected, to engage in political activities independently or in a political party, and to take part in a referendum. (...) All Turkish citizens over eighteen years of age shall have the right to vote in elections and to take part in referenda. Exercise of these rights shall be regulated by law*". Accordingly, every Turkish citizen who meet the criteria set forth by the laws have the right to political participation.

28. The procedures and principles to be followed in order to promote democratic elections during the election period are regulated by the relevant laws. Article 69 of the Constitution lays down the basic principles that "*Elections and referenda shall be held under the direction and supervision of the judiciary, in accordance with the principles of free, equal, secret, direct, universal suffrage, and public counting of the votes.*" Article 79 of the Constitution titled "General administration and supervision of elections" states that "*(1) The elections shall be held under the general administration and supervision of the judicial organs. (2) The Supreme Election Council shall execute all the functions to ensure the fair and orderly conduct of elections from the beginning to the end, carry out investigations and take final decisions, during and after the elections, on all irregularities, complaints and objections concerning the electoral matters, and receive the electoral records relating to the election of members of the Grand National Assembly of Türkiye and presidential elections (...).*"

- 29.** In terms of the elections held on 14 and 28 May 2023, the Supreme Election Council took all required measures in order to create an environment that allows political parties and independent candidates, before the voting day, to promote themselves freely, independently and on an equal basis, and to compete against other political parties and independent candidates through their programs and projects.
- 30.** Freedom of peaceful assembly is a democratic right safeguarded by the Turkish Constitution (Article 34) and the relevant national legislation. Accordingly, everyone, without discrimination, has the right to hold unarmed and peaceful meetings and demonstrations in a safe and free environment, without prior permission. No restrictions other than those specified in the law (for the purpose of protecting national security, public order, prevention of commission of crime, protection of public health and public morals or the rights and freedoms of others) shall be imposed. Law No. 2911 on Meetings and Demonstration Marches regulates the conditions and procedures to be applied for the exercise of this right, including the duties and responsibilities of the organizers, prohibition and postponement by the competent authority, the duties and powers of security forces and penal provisions.
- 31.** Furthermore, all measures regarding election campaigns (including outdoor and indoor meetings) were taken at the highest level in order to ensure a safe and peaceful environment before, during and after the elections in a full observance of the requirements of democracy. Security precautions regarding meetings held before the elections were implemented by competent authorities and bodies within the framework of Law No. 2911 on Meetings and Demonstration Marches and Law No. 298 on Basic Provisions of Elections and Voter Registers.

*On freedom of expression and media freedom in Türkiye especially in the context of the election:*

- 32.** Freedom of expression is safeguarded by the Turkish Constitution (Article 26) and other relevant legislation. Article 26 of the Constitution states that “*everyone has the right to express and disseminate his/her thoughts and opinions orally, in writing or through pictures or other media, individually or collectively. This freedom includes the liberty of receiving or imparting information or ideas without interference by official authorities*”. However, despite being the cornerstone for a democratic society, freedom of expression is not an absolute right and can be subject to limitations as determined by international law and jurisprudence.

- 33.** Article 10/2 of the ECHR states that *“the exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in confidence, or for maintaining the authority and impartiality of the judiciary.”* Likewise, Article 19 of the ICCPR states that *“...It may therefore be subject to certain restrictions, but these shall only be such as are provided by law and are necessary: a) For respect of the rights or reputations of others; b) For the protection of national security or of public order (ordre public), or of public health or morals.”*
- 34.** Article 26 of the Turkish Constitution sets out, in accordance with the ECHR and the ICCPR, that the exercise of freedom of expression may be restricted for the purposes of national security, public order, public safety, safeguarding the basic characteristics of the Republic and the indivisible integrity of the State with its territory and nation, preventing crime, punishing offenders, withholding information duly classified as a state secret, protecting the reputation or rights and private and family life of others, protecting professional secrets as prescribed by law, or ensuring the proper functioning of the judiciary.
- 35.** Expressions of opinion made for the purpose of criticism within the limits of reporting do not constitute a crime. In this context, within Article 6 of the Anti-Terror Law, it is envisaged that only statements and expressions that legitimize, praise or encourage terrorist organizations’ methods involving force, violence or intimidation are punishable under the Law. Additionally, Article 7 of the same Law expressly states that propaganda of terrorist organizations by legitimizing, praising and promoting their methods involving force, violence and intimidation constitutes a crime. Therefore, the elements of the offences in question have been concretized through the said provisions. Furthermore, in the same Article, though not members of a terrorist organisation, offenders who commit certain crimes on behalf of such organisation are prevented from receiving additional penalty under general provisions of Article 220/6 of the Turkish Penal Code (TPC).
- 36.** In terms of media freedom, there is an active and pluralistic media community (both domestic and foreign) in Türkiye enjoying international standards. The media is among the competitive sectors in Türkiye and in line with the free market economy, different

media groups can own means of communication such as television, newspaper and radio.

37. Furthermore, Turkish legislation envisages a comprehensive framework regarding media freedom, including the necessary constitutional protections. Article 28 of the Constitution titled “Freedom of the press” states that *“The press is free, and shall not be censored. The establishment of a printing house shall not be subject to prior permission or the deposit of a financial guarantee.”* while Article 30 titled “Protecting of printing facilities” states that *“Printing houses and their annexes, duly established as a press enterprise under law, and press equipment shall not be seized, confiscated, or barred from operation on the grounds of having been used in a crime”*. Article 3 of the Press Law No. 5187 also stipulates that *“The press is free. This freedom includes the right to acquire and disseminate information, and to criticize, interpret and create works.”*
38. Media freedom was also protected and promoted throughout the entire election period. In this regard, more specifically, the following measures were adopted before, during and after the election period:
- Pursuant to Article 52 of the Law No. 298, it is the Supreme Election Council’s and Turkish Radio and Television Corporation’s (TRT) duty to ensure that propaganda broadcast of political parties and Presidency candidates are conducted in complete impartiality and equality. In this context, TRT, public broadcasting agency in Türkiye, provided free airtime to all political parties and Presidency candidates to convey their messages. In addition, the date and time of the visual propaganda of political parties were duly determined by taking into consideration these parties’ requests and the capabilities of TRT.
  - Pursuant to Article 58/2 of the Law No. 298 which states that *“All propaganda to be made by political parties and candidates can be made in different languages and dialect apart from Turkish”*, Kurdish, Arabic, Syriac and Zaza languages were used along with Turkish during the election campaigns.
  - International election missions observed the elections.
  - Programs featuring politicians with different political views were broadcasted on social media platforms.
  - The media outlets freely followed and reported on the activities of politicians and candidates.

- On the election day, all mainstream media covered the election without any problems and hindrances.
- Between 1 January-28 May 2023, 230 newspapers, 26 magazines, 29 radio stations, 6 news agencies, 1 public institution, 38 online news websites were accredited by the Directorate of Communications. The current number of press cards issued is 17.296. As demonstrated from the abovementioned data, media outlets were accredited during the election period without any problems.
- Foreign press institutions which set up office in Türkiye freely performed their activities during the election period.

*On the Normative Framework Relating to Anti-Terrorism:*

- 39.** “Terrorism” is clearly defined in Article 1 of the Law on Combating Terrorism no. 3713 as follows: “Any kind of criminal act carried out by one or more persons belonging to an organization with the aim of changing the characteristics of the Republic as specified in the Constitution or its political, legal, social, secular and economic system; damaging the indivisible unity of the State with its territory and nation; endangering the existence of the Turkish State and Republic; weakening, destroying or seizing the authority of the State; eliminating fundamental rights and freedoms, or damaging the internal and external security of the State, public order or general health by means of pressure, force, violence, terror, intimidation, oppression or threat.”
- 40.** Pursuant to Article 314 of the TPC titled “Armed Organization”, in order for an organization to be considered as an armed terrorist organization, it is required that the organizations must be established with the purpose of committing the crimes listed in the TPC under the provisions titled “Offenses against State Security” and “Offenses against the Constitutional Order and Its Functioning” and be sufficiently armed or have the means to use such arms to commit such offenses, alongside the requirement to meet the conditions set out under Article 220 of the TPC titled “Establishing an Organization for the Purpose of Committing Crimes”.
- 41.** The Government is of the opinion that the legal elements of terrorism-related offenses are stipulated in the relevant legislation in a clear, predictable and understandable manner and are consistent with international human rights law.

*On measures relating to countering terrorism finance and risk assessments:*

**42.** The police operation in question which took place on 25 April 2023 was directly related to an ongoing criminal investigation on networks of terrorism and financing of terrorism in which certain individuals suspected to be affiliated with the PKK terrorist organization were involved.

**43.** In the financial investigation, a financial analysis report was provided by the Financial Crimes Investigation Board (MASAK), which is the financial investigation unit of Türkiye, upon a request sent by the Diyarbakır Provincial Public Prosecutor's Office in line with Article 161 of CCP which regulates that prosecutors are authorised to request any kind of information from law enforcement agencies under their command and any other public offices. According to Article 231/1(g) of the Presidential Decree No. 1, MASAK analyses and examines the money laundering and terrorist financing files conveyed by prosecutors, judges or courts.

**44.** On the measures related to countering terrorism finance and their compatibility with the principle of legal certainty, Türkiye has reached a largely compliant level in terms of Financial Action Task Force's (FATF) recommendations on this topic. In this respect, Turkish legislation on criminalization of financing of terrorism (FATF recommendation 5) was rated as "Largely Compliant" in Türkiye's Mutual Evaluation Report (MER) adopted in 2019. The said recommendation requires countries' compliance with the UN Terrorist Financing Convention, as a result of which legal certainty of acts and measures is highly ensured. In the same report, it was clearly expressed that sanctions in force in Türkiye were considered as dissuasive and proportionate (page 169 of Türkiye's MER, 2019). Moreover, Türkiye's targeted financial measures on terrorist financing (FATF recommendation 6) was rated as "Largely Compliant" in Türkiye's First Enhanced Follow Up Report adopted by the FATF Plenary in 2021. Both reports are accessible in FATF's website.

**45.** Regarding the concerns raised on the implementation of FATF recommendations 1 and 8, it should be emphasized that the case at issue appears to go beyond the scope of said FATF recommendations, as the subject matter has evolved to a criminal nature involving a criminal investigation rather than implementation of preventive measures and risk-based approach.

**46.** FATF methodology criterion 1.1 (risk-based approach) envisages that States should identify money laundering/terrorist financing risks and criterion 8.1 (non-profit

organizations-NPOs) sets out that countries should identify the subset of the organizations that fall within the definition of an NPO without prejudice to the requirements of the risk-based approach. In Türkiye, FATF-defined subset of NPOs is designated as “associations and foundations”, however, due to the strict rules and conditions for the establishment of foundations in Türkiye such as approval by a competent court, the foundations are less vulnerable to money laundering and terrorist financing risks. This situation is also demonstrated in the recently updated National Risk Assessment Report of Türkiye. Therefore, measures with respect to the prevention of misuse of NPOs mostly focus on associations. Misuse of an association activity is observed in many different types of associations. The risk analyses in this regard are conducted by the General Directorate of Relations with Civil Society (GDRCS) and risk criteria are updated annually based on the gained experience and views of the civil society organizations. GDRCS, in accordance with the results of the risks analyses, categorizes associations into three groups namely high risk, medium risk and low risk. In this regard, high and medium risk NPOs are prioritised and are subject to audit activities in accordance with the programs prepared for them. The aim is to ensure transparency with a more effective audit, to prevent abuse of charitable sentiments of people and to make NGOs more effective and reliable. Accordingly, Türkiye does not follow a “one size fits all” approach in the context of countering terrorism finance to address NPOs.

47. With regard to the risk analyses, Türkiye has updated its National Risk Assessment (NRA) in 2022 with the contributions of public and private sector institutions and the updated NRA was endorsed by the Minister of Treasury and Finance. According to the updated NRA, PKK/KCK/PYD-YPG poses the second terrorist financing risk in Türkiye and it is considered as high-risk terrorist organisation in terms of terrorist financing. Moreover, according to the vulnerability analysis, it has been detected that the PKK/KCK/PYD-YPG terrorist organization abuses NPOs as well as other countries in Europe (particularly the NPOs which give the impression that they were founded for cultural purposes) in order to collect funds (as if they were the revenues of so-called cultural activities, sales of goods etc.) and ensure recruitment for them.

#### *On attorneyship profession*

48. Attorneyship is regulated as a public service and a self-employed profession in Türkiye. In criminal cases, the attorney freely represents the defence which is one of the constituents of the judiciary.

**49.** According to Article 6 of the TPC titled "Definitions", in the application of criminal law, the term "jurist" refers to public prosecutors, judges of the supreme courts, judicial and administrative courts and practising lawyers.

**50.** Attorneys are provided with various safeguards in the Turkish legal system, some of which are provided below:

- Judicial bodies, police departments, other public institutions and agencies, state economic enterprises, private and public banks, notaries public, insurance companies and foundations must assist attorneys in carrying out their duties. These entities are required to submit to attorneys for their review the information and documents they require, without prejudice to special provisions in laws relating thereto.
- Crimes committed against attorneys during or in connection with the performance of their duties will be subject to the same provisions as if they were committed against judges.
- Safeguards are in place with regard to searches to be conducted in attorneys' offices, as explained in paragraph 20 above.
- It is obligatory to allocate adequate space for the use of the local bar association in every judicial office and for attorneys in every courtroom and enforcement office. Additionally, a consultation room appropriate to the respectability and importance of the profession shall be designated in every jailhouse and police station.
- It has been made possible by Law No. 7249 to establish more than one bar association in the same province, particularly in terms of bar associations with a large number of lawyers, in order to further facilitate the exercise of the profession, to eliminate possible delays in conducting the work, and for the bar association services to be carried out in a more efficient and effective way.

### **III. CONCLUSION**

**51.** In light of the above, and considering the fact that the procedural acts in the investigation currently being conducted are confidential due to the continued collection of evidence, the Government is of the view that the Special Procedures should respect the ongoing legal procedure conducted by the independent and impartial authorities.