



The Latest Example of Unlawful Asset Seizure Under the Pretext of Terrorism Charges in Turkey

Maydonoz Döner Case



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BELGIUM

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Introduction

On February 21, 2025, the Turkish government launched the so-called "Kıskaç-40" operation, targeting the fast-food chain Maydonoz Döner, which has over 400 branches across Turkey. According to Interior Minister Ali Yerlikaya, the operation was conducted on the grounds of "financing terrorism" and took place in 31 provinces, led from Antalya. As part of this crackdown, 353 suspects, including 10 public officials, were detained, and 126 were arrested¹. Additionally, the Savings Deposit Insurance Fund (TMSF) was appointed as a trustee to the parent company of Maydonoz Döner, Somca Gıda Dağıtım ve Pazarlama A.Ş., along with 21 other affiliated companies².

The Story of Maydonoz Döner

Maydonoz Döner was founded in Ankara in 2018 by a successful entrepreneur, Ömer Şeyhin. Other shareholders of the company include Cuma Dağlı, Engin Kayıkçı, Ömer Faruk Ekim, Yücel Bahri Öntemel, and Mehmet Kaşlı.

¹ <https://x.com/AliYerlikaya/status/1892858456220324137>

² <http://tr.euronews.com/2025/02/21/terror-orgutu-finansmani-ile-suclanan-maydonoz-donere-kayyum-atandi>

By 2024, the company had expanded to over 410 branches in 87 cities across eight countries spanning three continents. The franchise-based döner chain had 101 branches in Istanbul, 54 in Ankara, and 32 in İzmir³. The widespread presence and increasing profitability of Maydonoz Döner indicated strong consumer preference and trust in the brand. Within just six years, the company became one of Turkey's most successful ventures in the food sector. As of February 2025, Maydonoz Döner employed approximately 9,600 people⁴.

A key factor behind its rapid growth was the company's effective franchise model. By offering an affordable and highly profitable business model to entrepreneurs, the brand rapidly expanded across Turkey. Maydonoz Döner established itself in the food industry with its operational efficiency, consistent product quality, and strong marketing strategies. The company also leveraged digital marketing, social media management, and promotional campaigns to enhance customer loyalty and accelerate growth.

Beyond Turkey, Maydonoz Döner successfully entered international markets. By opening branches in Europe, the Middle East, and Asia, the company introduced traditional Turkish döner to a global audience. It pursued a strategic approach by adapting to local tastes and cultural differences, ensuring successful market penetration. Particularly in Germany, the Netherlands, and the United Kingdom, the brand gained significant traction and aimed to become a prominent international restaurant chain.

The Terrorism Financing Operation Against Maydonoz Döner and TMSF's Trusteeship

On February 21, 2025, Turkey's Interior Minister Ali Yerlikaya announced on the social media platform X that an operation targeting the shareholders, executives, and employees of the Maydonoz Döner fast-food chain had been conducted in 31 provinces. He stated that this action was part of efforts to dismantle the so-called "current structure of FETÖ" and combat terrorism financing. In his statement, the minister alleged that:

³ <https://maydonozdoner.com/franchise/>

⁴ <https://www.turkiyegazetesi.com.tr/gundem/fetonun-doner-sermayesi-maydonoz-donerin-patronu-cuma-daglinin-ifadesi-ortaya-cikti-1097538>

- Maydonoz Döner was financing "FETÖ" through its restaurant chain.
- The franchise model was used to grant unofficial partnerships to individuals previously prosecuted for ties to "FETÖ" in exchange for payments.
- The company required a reference from the organization for partnership approval, calling this model "Reference-Based Growth" (RTB).
- The business expanded internationally by granting new franchises abroad, thereby facilitating financial transfers from overseas.
- Some franchise locations hosted organizational meetings attended by individuals with existing legal records related to "FETÖ."



Immediately after the police operation, TMSF was appointed as a trustee to 21 companies affiliated with Maydonoz Döner⁵.

The Maydonoz Döner Operation: The Weaponization of Terror Laws to Seize Assets

Under President Erdoğan's administration, Turkey has progressively moved toward authoritarianism, disregarding universal democratic and legal norms. The police operation against Maydonoz Döner under the pretext of terrorism financing represents the latest in a series of systemic property rights violations that began in the 2010s and escalated during the state of emergency following the 2016 coup attempt. Several points should be considered regarding this operation:

1. For years, the Erdoğan government has exploited anti-terrorism and terrorism financing laws to suppress political opponents and cut off their economic resources⁶. This legal framework has been particularly weaponized against the

⁵ <https://www.tmsf.org.tr/tr/Basin/List/maydonoz-doner-hakk%C4%B1nda-bas%C4%B1n-duyurusu>

⁶ <https://www.amnesty.org/en/wp-content/uploads/2021/07/EUR4442692021TURKISH.pdf>

- Gülen Movement. Despite being internationally recognized as a non-violent organization with no connection to terrorism, Erdoğan's government and its controlled judiciary have arbitrarily classified the movement as a "terrorist organization." Reports from the United States, the European Union, the United Kingdom, and the United Nations explicitly state that the Gülen Movement is not involved in any violent or terrorist activities⁷.
2. In Turkey, anti-terrorism and terrorism financing laws are not applied according to universal legal principles but rather manipulated for political objectives^{8,9}. Opposition figures and groups are easily labeled as terrorists. For instance, even compensation awarded to former national footballer Hakan Şükür from defamation lawsuits was classified as terrorism financing due to his association with the Gülen Movement.

According to the current penal code in Turkey, courts have ruled that the people who insulted national football player Hakan Şükür should pay compensation due to the open insults he made. The compensation that football player Hakan Şükür rightfully won due to his closeness to the Gülen Movement, which is seen as opposition by the Turkish government for political reasons and treated as a terrorist organization, has been on the agenda in the media. Lawyer Muhammed GÖMÜK filed a complaint with the Board of Judges and Prosecutors, which conducts investigations into judges and prosecutors in Turkey, claiming that the compensation Hakan Şükür won for being unfairly insulted according to current laws will be used for the activities of the Gülen Movement, and therefore Hakan Şükür should not be given these compensations, that *the judges who ruled in favor of national football player Hakan Şükür in these*

https://tr.solidaritywithothers.com/_files/ugd/b886b2_90d7acc43914fecaa1eb6ee35919e9b.pdf
https://tr.solidaritywithothers.com/_files/ugd/b886b2_fc6c253a67774353adf9021e86deee4c.pdf
https://tr.solidaritywithothers.com/_files/ugd/b886b2_fb6723eba6a94abb9ae5c7c6acf3d510.pdf

⁷ <https://www.state.gov/reports/country-reports-on-terrorism-2019/turkey/>

<https://www.state.gov/reports/country-reports-on-terrorism-2021/turkiye>

<https://www.state.gov/reports/2021-country-reports-on-human-rightspractices/turkey/>

2021 Country Reports on Human Rights Practices: Turkey.

<https://www.reuters.com/article/world/eu-says-needs-concrete-evidence-from-turkey-to-deem-gulen-network-as-terrorist-idUSKBN1DU0DU/>

<https://www.government.nl/documents/reports/2021/03/18/general-country-of-origin-information-report-turkey>

⁸ The Gülen Movement: Challenging Turkey's "Terrorist Organization" Narrative Through Global Perspectives
 January 2025

https://www.solidaritywithothers.com/_files/ugd/b886b2_f1c77027fb854652b67dd22c2c6c019c.pdf

⁹ Misuse of FATF (Financial Action Task Force) Standards as a Tool of Transnational Repression

February 2025

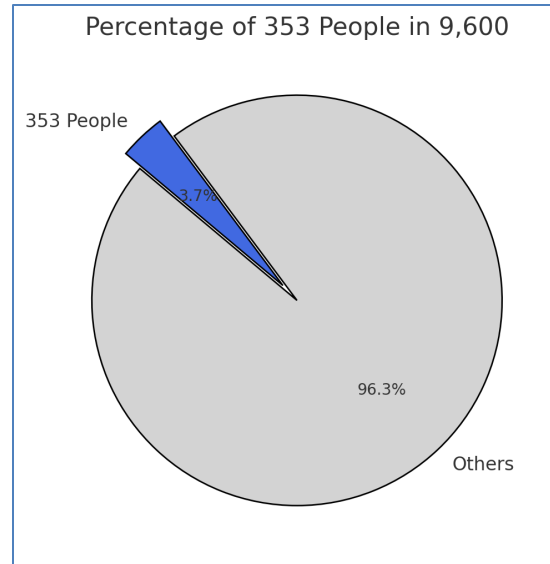
https://www.solidaritywithothers.com/_files/ugd/b886b2_f2a38aaf4797492a85a4d14b6f068418.pdf

insult cases were acting as intermediaries for a terrorist to earn income, and that the judges who ruled in favor of Hakan Şükür should be identified and punished in accordance with Article 2 of the Financing of Terrorism Law No. 6415 (financing of terrorism) and Article 220 of the Penal Code (establishing an organization for the purpose of committing a crime), and that they be removed from the profession of judge. The investigation into the complaint in question is ongoing¹⁰.

3. During the state of emergency, decrees led to the dismissal of approximately 200,000 public employees, the closure of over 4,000 private institutions accused of ties to the Gülen Movement, and the loss of employment for nearly 300,000 individuals. Additionally, amendments facilitated the easy appointment of trustees to companies alleged to be linked to terrorism. During the state of emergency, amendments made through Decree Law No. 674 enabled judicial institutions—having effectively become part of the Erdoğan administration—to easily appoint trustees to companies alleged to be linked to terrorism.
4. The employment of individuals dismissed by decree-laws (KHK) from public service or private sector jobs has been obstructed even in the private sector through practices such as 'Code-36' entries in the Social Security Institution's database, which indicate a person's KHK status. Some of these individuals attempted to continue their livelihoods by acquiring franchises from various companies. However, under the Erdoğan administration, even the attempt by KHK-dismissed individuals to start their own businesses or manage their own companies has been discouraged, and their legitimate commercial activities have been labeled as terrorism financing.

The act of KHK-dismissed individuals acquiring a franchise and operating a business cannot be considered a crime. Nevertheless, between 2018 and 2025, 353 employees of Maydonoz Döner—a company that had reached 410 branches and employed approximately 9,600 people—were either KHK-dismissed individuals or their relatives. Based on this, Maydonoz Döner was accused of financing terrorism. These 353 individuals made up only 3.7% of the company's total workforce. Despite this small proportion, the presence of KHK-affiliated individuals was used as a pretext to appoint TMSF as a trustee over Maydonoz Döner and 21 affiliated companies on the grounds of terrorism financing.

¹⁰ <https://www.iha.com.tr/izmir-haberleri/hakan-sukure-tazminat-kazandiran-hakimler-hakkinda-hskya-ihrac-talebi-189617635>



- As seen in the case of Maydonoz Döner, in Turkey under Erdoğan's regime, anyone who does not submit to the government or opposes it faces the threat of arrest or asset seizure. To this end, accusations such as terrorism, financing of terrorism, and establishing a criminal organization are used by the judiciary as pretexts. For example, precautionary measures were imposed on the assets of individuals close to Ekrem İmamoğlu¹¹, who is expected to run as a presidential candidate, based on an ongoing investigation.

On February 19, 2025, as part of investigations into terrorism and corruption, the family-owned company İmamoğlu İnşaat, in which Istanbul Metropolitan Mayor Ekrem İmamoğlu is a partner, was seized upon the request of the Istanbul Chief Public Prosecutor's Office and the decision of the Criminal Judgeship of Peace. As a result of this decision, the company's bank accounts, real estate, and movable assets have been confiscated¹².

- The Maydonoz Döner case demonstrates that in Erdoğan's Turkey, any company employing, working with, or doing business with individuals dismissed by decree-laws (KHK) can easily be accused of terrorism financing. This clearly reveals the absence of entrepreneurial freedom in Turkey and how public institutions deliberately obstruct KHK-dismissed individuals from finding employment or starting their own businesses.

¹¹ <https://www.cumhuriyet.com.tr/yazarlar/baris-terkoglu/imamoglunun-en-uzun-marti-2307746>

¹² <https://bianet.org/haber/istanbul-mayors-construction-company-seized-amid-investigation-305611>

7. This profound victimization of KHK-dismissed individuals has been identified and criticized by various figures. Journalist Elif Çakır stated: 'So what are these people supposed to do? You don't let them work. You don't allow them to work for the state. People in the private sector are afraid to hire them. They end up working without insurance. Some of them have even tried to start their own businesses. They've opened döner shops. Judges, police officers, soldiers — they're selling döner now. But even that's not allowed. What do you want from these people? What are they supposed to do then? At least give them their passports so they can leave Turkey. But you don't allow that either.'¹³
8. The police operation against Maydonoz Döner and the subsequent appointment of TMSF as trustee to related companies is the latest example of Erdoğan's government unlawfully seizing companies through legal frameworks created during the state of emergency period. Following the state of emergency, TMSF was appointed as trustee to 1,371¹⁴ companies on the grounds of their alleged links to the Gülen Movement. Many major companies, including Boydak Holding, Koza-İpek Holding, and Aydınli Group, were confiscated using emergency powers. These companies suffered an average loss of 65% in market value, effectively amounting to the looting of their assets. The police operation against Maydonoz Döner and the subsequent appointment of TMSF as trustee marks the first step in the plundering of yet another highly successful company.
9. Following the appointment of the Savings Deposit Insurance Fund (TMSF) as trustee, the TMSF designated the new management for Maydonoz Döner and its 21 affiliated companies. As with previous trustee appointments, individuals close to the Erdoğan regime were assigned to these positions. For instance, **Meryem Karaköse, Deputy Chair of the AKP Istanbul Women's Branch**, was appointed as one of the trustees to Maydonoz Döner companies¹⁵. Karaköse is also a member of the Central



¹³ <https://kronos38.news/karar-yazarlari-ne-yapsin-bu-insanlar-olsunler-mi/>

¹⁴ https://www.solidaritywithothers.com/files/ugd/b886b2_fc6c253a67774353adf9021e86deee4c.pdf

¹⁵ <https://www.gercekgundem.com/guncel/akpli-meryem-karakose-maydonoz-donere-kayyim-olarak-atandi-522901>

Executive Committee of the AKP Women's Branch¹⁶.

| |
|---|
| <p>T.C. İSTANBUL TİCARET SİCİLİ MÜDÜRLÜĞÜ'NDEN İlan Sıra No: 53677 Mersis No: 0773072861500001 Ticaret Sicil/Dosya No: 255275-5</p> <p>Ticaret Unvanı: SOMCA GIDA DAĞITIM VE PAZARLAMA ANONİM ŞİRKETİ</p> <p>Adres : Altayçeşme Mah. Öz Sk. Gold Plaza Maltepe No: 19 İç Kapı No: 19 Maltepe / İstanbul Yukarıda bilgileri verilen şirket ile ilgili olarak aşağıda belirtilen hususlar müdürlüğümüze ibraz edilen belgelere istinaden ve Türk Ticaret Kanunu'na uygun olarak 4.3.2025 tarihinde resen tescil edildiği ilan olunur. Tescil Edilen Hususlar: Yönetim Kurulu / Yetkililer Tescile Delil Olan Belgeler: 27.2.2025 Tarihli 2025/129 Sayılı Diğer Kararı (T.c. Tasarruf Mevduatı Sigorta Fonu İştirakler Ve Gayrimenkuller Daire Başkanlığının 27.2.2025 Tarih Ve E-81514179-100-120404 Sayılı Yazısı İle Bildirilen, Fon Kurulunun 27.2.2025 Tarihli Ve 2025/129 Sayılı Kararı) YÖNETİM KURULU / YETKİLİLER Türkiye Cumhuriyeti Uyruklu 199*****08 Kimlik No'lu, İSTANBUL / KAĞITHANE adresinde ikamet eden, MERYEM KARAKÖSE 20.2.2028 tarihine kadar Yönetim Kurulu Üyesi olarak seçilmiştir.</p> <p>(20002087)</p> |
|---|

10. The other individuals appointed to the companies are as follows: Chairman of the Board: Enis Güçlü Şirin; Deputy Chairman: Abdülkadir Koçak; Board Members: Reyhan Şenel, Nacit Hami Oktay, Nursemin Güngör, Serap Günaydın, Gülsen Altınaoy, Ertuğrul Salıcı, Sinan Aktaş, Metin Şapçı, Ercan Doğan, Emre Ertaş, Sami Erdem, Selma Yıldız, Davut Yılmaz, Sümeyye Mutlu, Murat Karakaya, and Aybike Kaynar.

¹⁶ <https://akparti.org.tr/kadinkollari/yonetim/mkyk/>

T.C. İSTANBUL TİCARET SİCİLİ MÜDÜRLÜĞÜ'NDEN
İlan Sıra No: 51433
Mersis No: 0773072861500001
Ticaret Sicil/Dosya No: 255275-5





Ticaret Unvanı:
SOMCA GIDA DAĞITIM VE PAZARLAMA ANONİM ŞİRKETİ

Adres : Altayçeşme Mah. Öz Sk. Gold Plaza Maltepe No: 19 İç Kapı No: 19 Maltepe / İstanbul
Yukarıda bilgileri verilen şirket ile ilgili olarak aşağıda belirtilen hususlar müdürlüğümüze ibraz edilen belgelere istinaden ve Türk Ticaret Kanunu'na uygun olarak 28.2.2025 tarihinde resen tescil edildiği ilan olunur.

Tescil Edilen Hususlar: Yönetim Kurulu / Yetkililer, Kişi Bilgileri Değişikliği
Tescile Delil Olan Belgeler: 19.2.2025 Tarihli 2025/1302 D.İş Sayılı Diğer Kararı, (-Antalya 1. Sulh Ceza Hakimliğinin 19.02.2025 Tarihli Ve 2025/1302 D. İş Sayılı Kararıyla; Şirket İşlerinin Yürütülmesiyle İlgili Olarak Tasarruf Mevduatı Sigorta Fonunun Kayyım Olarak Atanmasına, Yönetim Organının Yetkilerinin Ve Yönetim Organının Yetkileri İle Birlikte Ortaklık Payları Ve Menkul Kıymetler İdare Yetkilerinin Tümüyle Kayyıma Verilmesine Karar Verildiği Hususunun Tescil Ve İlanı), 20.2.2025 Tarihli 2025/113 Sayılı Diğer Kararı, (-T.c. Tasarruf Mevduatı Sigorta Fonu İştirakler Ve Gayrimenkuller Daire Başkanlığının 21.2.2025 Tarih Ve E-81514179-100-119892 Sayılı Yazısı İle Bildirilen; Fon Kurulunun 20.02.2025 Tarihli Ve 2025/113 Sayılı Kararıyla; Yönetim Kurulunun Fon Tarafından Oluşturulmasına Ve Yönetim Kurulu Başkanlığına Enis Güçlü Şirin' İni, Yönetim Kurulu Başkan Vekilliğine Abdulkadir Koçak' İni, Yönetim Kurulu Üyeliklerine Reyhan Şenel, Nacit Hami Oktay, Nursemin Güngör, Serap Günaydın, Gülşen Altınsoy Gündoğdu, Ertuğrul Salıcı, Sinan Aktaş, Metin Şapçı, Ercan Doğan, Emre Ertaş, Sami Erdem, Selma Yıldız, Davut Yılmaz, Sümeyye Mutlu, Murat Karakaya Ve Aybike Kaynar Bardakçı' Nın Atanmalarına Karar Verildiği Hususunun Tescil Ve İlanı), 24.2.2025 Tarihli 2025/1 Sayılı Yönetim Kurulu Kararı, (-T.c. Tasarruf Mevduatı Sigorta Fonu İştirakler Ve Gayrimenkuller Daire Başkanlığının 24.2.2025 Tarih Ve E-81514179-100-120028 Sayılı Yazısı İle Bildirilen; 24.2.2025 Tarihli 2025/1 Sayılı Yönetim Kurulu Kararı)

11. Enis Güçlü Şirin, appointed by TMSF as chairman of the board of Maydonoz Döner companies, had previously been assigned as a board member to some of Turkey's largest mining companies: Koza Anadolu Metal Mining Inc., Ipek Natural Energy Resources Exploration and Production Inc., and Koza Gold Enterprises Inc., all of which were seized during investigations targeting the Gülen Movement¹⁷.

¹⁷ <https://www.marketscreener.com/insider/ENIS-GUCLU-SIRIN-A2PP7W/>

| Enis Guclu Sirin active positions | | | |
|--|-----------------------|------------|-----|
| Companies | Position | Start | End |
|  KOZA ALTIN ISLETMELERI | Director/Board Member | 2019-04-07 | - |
|  IPEK DOGAL ENERJİ KAYNAKLARI ARASTIRMA VE ÜRETİM | Director/Board Member | - | - |
|  KOZA ANADOLU METAL MADENCİLİK İŞLETMELERİ | Director/Board Member | 2019-04-07 | - |
|  Birlesik Fon Bankasi AS | Director/Board Member | - | - |

12. Enis Güçlü Şirin and Abdulkadir Koçak, appointed by TMSF as trustees to Maydonoz Döner, were also jointly assigned to Bizim Menkul Değerler Inc., another company that had been seized.

| PAY SAHİBİNİN UNVANI | Adresi (Şirket Merkezi) | Sermaye Tutarı (TL) | Pay % |
|---|---|---------------------|-------|
| Bizim Menkul Değerler A.Ş. | Yenisahra Mahallesi, İnönü Caddesi, Kanarya Sokak, No:25, K:4, 34746 Ataşehir / İSTANBUL | 5.000.000,- | %100 |
| d) Hesap Dönemi İçinde Meydana Gelen Değişiklikleri: Yoktur. | | | |
| B) İMTİYAZLI PAYLARA İLİŞKİN BİLGİLER Yoktur. | | | |
| C) ŞİRKETİN YÖNETİM ORGANI, ÜST DÜZEY YÖNETİCİ VE PERSONEL BİLGİLERİ | | | |
| a) Şirketin Yönetim Organı: 5 kişiden oluşan Yönetim Kurulu'dur. (30.09.2018) | | | |
| Yönetim Kurulu: | | | |
| Adı Soyadı | Görevi | | |
| İsmail GÜLER | Başkan | | |
| Enis Güçlü ŞİRİN | Başkan Vekili | | |
| Alpaslan Baki ERTEKİN | Üye | | |
| Muhammed Emin SARIOĞLU | Üye | | |
| Abdulkadir KOÇAK | Üye | | |

13. Media reports have claimed that the operation against Maydonoz Döner, a successful business venture, was preceded by demands for extortion¹⁸ from the company's owners, and when they refused to comply, the operation was launched and the company was seized. These allegations support the view that under Erdoğan's administration, opposition-linked companies are systematically targeted and judicial operations are used as a tool to confiscate their assets.

14. The police operation against Maydonoz Döner was publicly announced by the Minister of Interior as "Kıskaç-40". Since taking office, the Minister has used such code names for large-scale detention operations targeting the Gülen Movement, signaling that further operations will be carried out against companies associated

¹⁸ <https://kronos38.news/maydonoz-donere-cokmenin-nedeni-harac-vermeyi-kabul-etmemesi-mi/>

with individuals linked to the movement and that their assets will be seized by Erdoğan's government and its supporters.

Conclusion

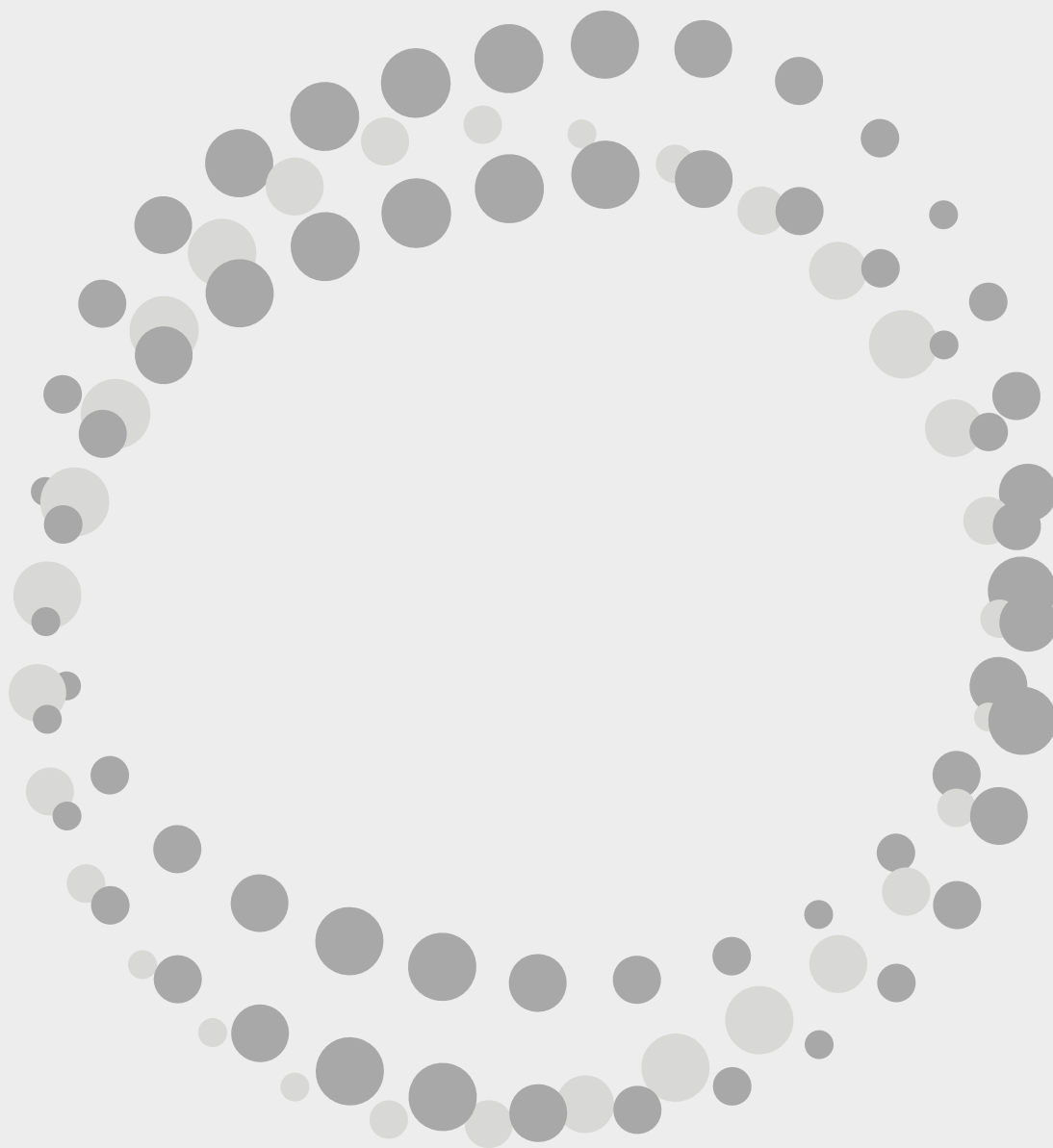
The operation against Maydonoz Döner and the subsequent appointment of the Savings Deposit Insurance Fund (TMSF) as trustee is part of a broader pattern of increasingly widespread and unlawful asset seizures in Turkey. This incident not only obstructs the commercial activities of a single company but also exposes how the rule of law has been instrumentalized by political power.

The fact that Maydonoz Döner's employees and franchise entrepreneurs were labeled as criminal elements solely for not aligning with government policies illustrates the arbitrary nature of both the economic and legal systems in Turkey. The application of anti-terrorism financing laws in a way that undermines judicial independence and violates fundamental legal principles is a clear indication of the politicization of such operations, where even economic competition cannot take place within a legal framework.

This event also has a chilling effect on Turkey's economic circles. Investors increasingly see the legal uncertainty as a threat to a secure business environment and grow hesitant to continue their commercial activities. The state's arbitrary interventions in the private sector ultimately act as a deterrent to both domestic and foreign investment.

Moreover, the fact that trustees appointed by TMSF are individuals closely aligned with the ruling political power not only harms economic management and market balance but also demonstrates a grave violation of judicial impartiality and the rule of law. The significant loss in market value experienced by many previously seized companies reveals that trustee administrations are largely ineffective and that their real purpose is not to maintain commercial operations but to support specific capital groups and political interests.

In conclusion, the Maydonoz Döner case is a striking example of how the legal and economic framework in Turkey is being arbitrarily redefined, and how political motives are destroying the foundations of a market economy. The continuation of such cases will further erode confidence in the rule of law, negatively impact international investment, and obstruct the ability of the private sector to operate transparently and competitively.



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