

IN THE EUROPEAN COURT OF HUMAN RIGHTS

Application nos. 5797/22 and 27507/23

BETWEEN:

Kaos Gay and Lesbian Cultural Research and Solidarity Association (Kaos GL)

Applicant

- and -

TÜRKİYE

Respondent

- and -

The Turkey Human Rights Litigation Support Project
The Association for Monitoring Equal Rights (*Eşit Haklar İçin İzleme Derneği*)
The Human Rights Foundation of Turkey (*Türkiye İnsan Hakları Vakfı*)
Truth Justice Memory Center (*Hakikat Adalet Hafıza Merkezi*)
University Queer Research and LGBTI+ Solidarity Association
(*Üniversiteli Kuir Araştırmaları ve LGBTİ+ Dayanışma Derneği*)
Women for Women's Human Rights (*Kadının İnsan Hakları Derneği*)
Interveners

**WRITTEN SUBMISSIONS ON BEHALF OF THE
INTERVENERS**

I. Introduction

1. The Third-Party Interveners ('the Interveners') submit these comments by leave of the President of the Second Section of the European Court of Human Rights ('ECtHR' or 'the Court') granted on 18 October 2024 under Rule 44(3) of the Rules of Court.
2. The present case concerns Ankara Governorate's ban imposed on 18 May 2016 on a Pride March planned for 22 May 2016 (App. no. 27507/23) and the indefinite ban dated 17 November 2017 on all collective activities of pro-LGBTI+ rights civil society organisations (App. no. 5797/22), including the applicant association.
3. Drawing on expertise as organisations specialising in international human rights law and working extensively on human rights in Türkiye, the Interveners will address the following issues arising in this case, which are directly linked to the Court's deliberations under Articles 10, 11, 13 and 14 of the Convention in the context of LGBTI+ rights: the systematic bans on assemblies and collective activities of the LGBTI+ community in Türkiye (Section II); the domestic mechanisms for challenging administrative bans on LGBTI+ assemblies and events, and their compatibility with Article 13 standards (Section III); other practices by Turkish authorities that have impeded LGBTI+ individuals from exercising their rights under Articles 10 and 11 of the Convention (Section IV); and the discriminatory nature of the Turkish authorities' escalating bans and practices targeting LGBTI+ individuals and community (Section V).

II. Systematic restrictions on LGBTI+ assemblies and collective activities in Türkiye

4. Building on the international standards that permit restrictions on the right to peaceful assembly only under strict conditions of legality, a legitimate aim, necessity and proportionality, even cases of non-compliance with technical legal requirements, such as the lack of prior authorisation, do not necessarily justify restricting freedom of assembly.¹ While such regulatory rules might help manage public events and ensure safety, their enforcement must not become an end in itself² or serve as "a hidden obstacle to the freedom of peaceful assembly protected by the Convention".³
5. States must not only avoid undue restrictions but also actively safeguard this right,⁴ especially for vulnerable groups like LGBTIQI+ individuals, who face higher risks of victimisation.⁵ In cases concerning public events supporting the rights of sexual minorities, the Court emphasised that authorities have a positive obligation to actively ensure the events can proceed peacefully.⁶ This includes publicly promoting tolerance, warning against unlawful interference, and taking steps to prevent homophobic attacks or

¹ Registry of the ECtHR, 'Guide on Article 11 of the European Convention on Human Rights: Freedom of assembly and association' (updated on 31 August 2024), para. 98; ECtHR, *Oya Ataman v. Turkey*, No. 74552/01, 5 December 2006, paras. 38-44; *Nurettin Aldemir and Others v. Turkey* (App. nos. 32124/02, 32126/02). See also Report of the UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, A/HRC/23/39, 24 April 2013, para. 51 (stressing that if organizers have failed to notify the authorities, the assembly should not be dispersed automatically, and the organizers should not be subject to criminal sanctions or to administrative sanctions resulting in fines or imprisonment simply on this account).

² ECtHR, *Cisse v. France*, No. 51346/99, 9 April 2002, para. 50; *Oya Ataman v. Turkey*, No. 74552/01, 5 December 2006, paras. 37-39; *Gafgaz Mammadov v. Azerbaijan*, No. 60259/11, 15 October 2015, para. 59.

³ ECtHR, *Samit Karabulut v. Turkey*, no. 16999/04, para. 35, 27 January 2009; *Berladir and Others v. Russia*, No. 34202/06, 10 July 2012 para. 39; *Navalny v. Russia* [GC], no. 29580/12 para. 148, 15 November 2018.

⁴ ECtHR, *Kudrevičius and Others v. Lithuania* [GC], No. 37553/05, 15 October 2015, para. 158; *Djavit An v. Turkey*, No. 20652/92, 20 February 2003, para. 57.

⁵ ECtHR, *Bączkowski and Others v. Poland*, No. 1543/06, 3 May 2007, para. 64.

⁶ ECtHR, *Identoba and Others v. Georgia*, No. 73235/12, 12 May 2015, para. 99.

disruptions by counter-demonstrators.⁷

6. Türkiye's domestic legislative framework governing the right to freedom of peaceful assembly is not in line with Convention standards on the right to peaceful assembly. First, provisions of Law No. 2911 allow unwarranted restrictions, blanket bans on demonstrations, dispersals and harsh sentences, contrary to Article 11 of the Convention.⁸ These deficiencies have been consistently highlighted by the ECtHR and Committee of Ministers.⁹ Second, after the 2016 attempted coup, emergency measures further restricted the freedom of assembly.¹⁰ Many of these restrictive provisions were later incorporated into permanent legislation,¹¹ including through the 2018 'omnibus law',¹² undermining civil society activities and deviating from ECtHR standards.¹³ Last, the Directive on Tear Gas

⁷ ECtHR, *Berkman v. Russia*, No. 46712/15, 1 December 2020, paras. 55-57.

⁸ E.g. (i) Article 10 of Law No. 2911 requires that the organisers of both indoor and outdoor assemblies notify the authorities of an assembly at least 48 hours beforehand, in addition to other procedural requirements. The duty to notify the authorities of assemblies is implemented as a de facto permission mechanism, which is in breach of Article 34 of the Turkish Constitution stating that "Everyone has the right to hold unarmed and peaceful meetings and demonstration marches without prior permission"; (ii) Article 6 of Law No. 2911 allows governors and district governors to determine locations and routes where assemblies are allowed to take place; (iii) Under Article 17 of Law No. 2911, governors and district governors are also entitled to "postpone a specific meeting for up to a maximum of one month for reasons of national security, public order, prevention of crime, protection of public health, public morality or the rights and freedoms of others". They may also "ban the meeting in case there is an evident and imminent threat of a crime being committed". In fact, the law provides the authorities with a complete discretion to evaluate any such risks; (iv) Article 19 of the same law, allows governors to postpone and ban all meetings in cities and districts for up to one month for reasons of national security, public order, prevention of crime, protection of public health, public morality or the rights and freedoms of others; (v) According to Article 23 of Law No. 2911, assemblies shall be deemed to be "unlawful" if their organisers fail to fulfil various procedural requirements, including the obligation to notify the authorities and to respect the restrictions on their location. (vi) Under Article 24, police are entitled to disperse "unlawful" assemblies, including those which start lawfully but become unlawful during the course of the assembly, by first giving a notice to disperse and then by using force. As a result, police may crack down on assemblies that they characterise as "unlawful" or "unauthorised" on the basis of these provisions, regardless of whether the assembly is peaceful or not, and whether their actions meet the test of necessity and proportionality. See for more detail, Joint submission by 33 NGOs and Bar associations pursuant to Rule 9.2 of the Committee of Ministers' Rules for the Supervision of the Execution of Judgments Providing Observations on the Implementation of *Oya Ataman* group (App. No. 74552/01) (23/01/2023) paras. 20-26, [https://hudoc.exec.coe.int/?i=DH-DD\(2023\)134E](https://hudoc.exec.coe.int/?i=DH-DD(2023)134E). See the Committee of Ministers, Notes on the Agenda 1411th meeting (DH) (14-16 September 2021) - H46-38 *Oya Ataman* group v. Turkey (Application No. 74552/01).

⁹ See *Oya Ataman v. Turkey*, No. 74552/01, 5 December 2006; *Abdullah Yaşa and Others v. Turkey*, No. 44827/08, 16 July 2013; *İzci v. Turkey*, No. 42606/05, 23 July 2013; *Ataykaya v. Turkey*, No. 50275/08, 22 July 2014; and *Süleyman Çelebi and Others v. Turkey*, No. 37273/10, 24 August 2016. See also CoE Committee of Ministers, Interim Resolution CM/ResDH(2023)39, <https://hudoc.exec.coe.int/eng?i=001-223731>; The Committee of Ministers, Decisions, 1411th meeting (DH) (14-16 September 2021) - H46-38 *Oya Ataman* group v. Turkey (Application No. 74552/01), [https://hudoc.exec.coe.int/ENG?i=CM/Del/Dec\(2021\)1411/H46-38E](https://hudoc.exec.coe.int/ENG?i=CM/Del/Dec(2021)1411/H46-38E).

¹⁰ FIDH/OMCT's Observatory for the Protection of Human Rights Defenders, 'A Perpetual Emergency: Attacks on Freedom of Assembly in Turkey and Repercussions for Civil Society' ("FIDH report") p. 13 (July 2020), https://www.fidh.org/IMG/pdf/obs_turkeyweb.pdf (Article 11(m) of Law 2935 on State of Emergency allowed the governors to ban, suspend, and restrict outdoor and indoor assemblies and subject them to prior permission. According to Article 11(b), the governors were also entitled to ban people from moving and assembling in certain areas and/or during certain times. As a result, severe restrictions such as blanket bans on peaceful assemblies were frequently imposed).

¹¹ Joint Rule 9.2 submission by 33 NGOs and Bar associations (n 8), para. 25.

¹² Law No. 7145 on the Amendment of Certain Laws and Decree Laws (*Bazı Kanun ve Kanun Hükmünde Kararnamelerde Değişiklik Yapılmasına Dair Kanun*), Official Gazette no. 30495, 31 July 2018.

¹³ Ibid. e.g. (i) Amendment to Article 6 of Law No. 2911 gave provincial governors the right to decide on the venue and the route of gatherings, provided that the venue or the route 'do not make the daily life of citizens excessively and unbearably difficult.'; (ii) Amendment to Article 7 of Law No. 2911 allowed gatherings in open places until night-time and in open places until midnight (the latter with the governor's permission). Recently, this amendment was found in breach of the Constitution by the Constitutional Court on the ground that this ban was "not necessary and proportionate in a democratic society"; (iii) Amendment to Article 11 (C) of Law No. 5442 on Provincial Administration allows provincial governors to take preventive measures for maintaining peace, security, right to physical integrity, and public order in their provinces by banning the entry or exit of individuals to their provinces for fifteen days. Furthermore, these restrictions can be extended after the initial fifteen days on a continuous basis. The broad powers under this provision have allowed governors to ban many peaceful public assemblies and indoor human rights events, adding to the other limitations provided by Law No. 2911. See also Rule 9.2 Communication from Human Rights Joint Platform (25/01/2019), 1340th meeting (March 2019) (DH), [https://hudoc.exec.coe.int/eng?i=DH-DD\(2019\)125E](https://hudoc.exec.coe.int/eng?i=DH-DD(2019)125E).

and related equipment (“the Directive”) fails to fully comply with international standards, compounding the issue of disproportionate measures against assemblies.¹⁴

7. Local authorities interpret this legal framework restrictively, leading to abusive practices that severely limit the right to freedom of assembly and disproportionately impact vulnerable groups, particularly the LGBTI+ community.¹⁵ Since 2015, authorities have systematically issued administrative bans on LGBTI+ assemblies,¹⁶ including Pride Marches, citing vague or unjustified reasons such as “public order” or “social sensitivities.”¹⁷ The Istanbul Pride March, successfully held from 2003 to 2015,¹⁸ has been banned since.¹⁹ Similar bans and police interventions have occurred nationwide shortly before the marches or events under laws such as Article 17 of Law No. 2911 and Articles 11 and 32/ç of Law No. 5442 on the Provincial Administration Law.²⁰
8. During the state of emergency (2016-2018), all LGBTQI+ events were banned indefinitely

¹⁴ See the Committee of Ministers, Notes on the Agenda 1411th meeting (DH) (14-16 September 2021) - H46-38 Oya Ataman group v. Turkey (Application No. 74552/01). Even though the authorities suggested that the Directive ensures that persons who are exposed to the gas have immediate access to medical attention, it did not seem to contain a specific provision in this sense; a lacuna that had been highlighted by the ECtHR and the European Committee for the Prevention of Torture. Moreover, as the Directive allowed the use of tear gas in case of “physical attacks against the security forces”, it was not clear whether the use of the gas is limited only to situations of serious risk to the physical integrity of law enforcement officers, as required by the ECtHR’s case law.

¹⁵ LGBTI activism became publicly visible in Türkiye in the late 1990s. They had immediately met with government repression, centred on shutting down the associations altogether or preventing their registration, rather than on preventing or banning specific events and assemblies organised or facilitated by these organisations. See e.g. Human Rights Watch, “We Need a Law for Liberation” Gender, Sexuality, and Human Rights in a Changing Turkey’, May 2008, pp. 91-98, <https://www.hrw.org/report/2008/05/21/we-need-law-liberation/gender-sexuality-and-human-rights-changing-turkey>; Ahmet Güneş, P24, ‘İlk Eylemden Bugüne LGBTİ Hareketi’ (2 July 2014), <https://platform24.org/arsiv/ilk-eylemden-bugune-lgbti-hareketi/>.

¹⁶ İnsan Hakları Derneği (IHD), ‘İnsan Hakları Eylem Planı Çerçevesinde LGBTI+ Hakları ve Hak İhlalleri Raporu’ (February 2024), https://ihd.org.tr/en/wp-content/uploads/2024/02/IHD_LGBTI-Rights-Violations-Report.pdf; Umut Rojda Yıldırım, Sosyal Politika, Cinsiyet Kimliği ve Cinsel Yönelim Çalışmaları Derneği (SPoD), ‘2015’ten Günümüze Yasaklarla İstanbul Onur Yürüyüşü’ (Report concerning the restrictions on the Istanbul Pride March since 2015) (December 2022), <https://spod.org.tr/wp-content/uploads/2022/12/2015ten-Gunumuzue-Yasaklarla-Istanbul-LGBTI-Onur-Yuruyusu.pdf>.

¹⁷ Ibid. para. 11; see for more detail, D. Çiğdem Sever, ‘Assessment of the Effectiveness of Administrative Justice in the Right to Assembly in Turkey: A Review of Annulment Action Against Bans and Action for Damages Against Ill-Treatment’ (ESHID, 2022), pp. 20-21, <https://www.esihaklar.org/wp-content/uploads/2022/08/Assessment-of-The-Effectiveness-of-Administrative-Justice-in-The-Right-to-Assembly-in-Turkey.pdf> (E.g. The decision regarding the ban of the Pride Parade, which was to be held in Istanbul on 30 June 2019 mention the grounds “public order”, “possibility of provocation” and “social sensitivities”, which were later considered sufficient by the first instance administrative court. Also, Ankara Governor’s decision of ban of 17 November 2017 on all LGBTI+ events also mentions “public order”, “prevention of crime”, “protection of general health and morals of others or the rights and freedom of others” and “social sensitivities”); Committee of Ministers 1507th meeting (September 2024) (DH) - Rule 9.2 - Communication from NGOs (SPoD), ÜniKuir and HEVI LGBTI+ Association, KaosGL Association, Free Colours Association, Lambdaistanbul LGBTI+ Solidarity Association, 17 May Association, Young LGBTI+ Association, Red Umbrella Sexual Health and Human Rights Association, Families and Friends of LGBTI+’s Association, Muamma LGBTI+ Education Research and Solidarity Association, Ankara Rainbow Families Association, Pink Life LGBTI+ Solidarity Association) (30 July 2024). concerning the case of OYA ATAMAN v. Turkey (Application No. 74552/01) para. 10 (Although the Pride Parade did not again coincide with Ramadan in 2017, it was still banned, this time for security concerns, signalling that Ramadan was only a pretext used by the authorities to crack down on the LGBTI+ community), [https://hudoc.exec.coe.int/?i=DH-DD\(2024\)893E](https://hudoc.exec.coe.int/?i=DH-DD(2024)893E).

¹⁸ See Commissioner for Human Right’s letter to the Turkish authorities, <https://rm.coe.int/letter-to-mr-suleyman-soyulu-minister-of-interior-and-mr-abdulhamit-gul/1680a2e486>; SPoD, ‘2015’ten Günümüze Yasaklarla İstanbul Onur Yürüyüşü’ (n 166).

¹⁹ Rule 9.2 - Communication from NGOs (SPoD and others) (n 17) para. 14; SPoD, ‘2015’ten Günümüze Yasaklarla İstanbul Onur Yürüyüşü’ (n 16).

²⁰ Provincial governates imposed bans on the Pride Parade in other cities and districts of Türkiye, including Ankara, İzmir, Aydın, Eskişehir, Kocaeli, Çanakkale, Mersin, Adana, Şişli, Kadıköy and Datça. See for more detail, IHD, ‘İnsan Hakları Eylem Planı Çerçevesinde LGBTI+ Hakları ve Hak İhlalleri Raporu’ (n 16) pp.57-60; SPoD, ‘2015’ten Günümüze Yasaklarla İstanbul Onur Yürüyüşü’ (2022) (n 16); Committee of Ministers 1507th meeting (September 2024) (DH), Rule 9.2 - Communication from NGOs (SPoD and others) (n 17), para. 10; See also Joint Rule 9.2 submission by 33 NGOs and Bar associations (n 8) para. 35.

on discriminatory grounds.²¹ This practice continued post-emergency, with bans persisting until overturned by courts, as seen in Ankara in 2019.²² University administrations, including those at Middle East Technical University (“METU”),²³ Boğaziçi,²⁴ and Mimar Sinan,²⁵ have also imposed bans on Pride events, highlighting the widespread nature of these restrictions.²⁶

9. These widespread and arbitrary restrictions on LGBTI+ assemblies since 2015 signal an increasingly anti-LGBTQI+ agenda and are incompatible with ECtHR standards under Articles 10 and 11 of the Convention, undermining Türkiye’s obligations to protect the right to freedom of peaceful assembly for all.²⁷

III. Ineffectiveness of domestic remedies against bans on LGBTI+ events

10. Under Article 13 of the Convention (right to an effective remedy), domestic remedies must address complaints fairly and promptly, ensuring decisions are timely and enforceable. This requirement is particularly critical in the context of Article 11 (the right to freedom of assembly), where the timing of public gatherings is essential and delays can render this freedom meaningless.²⁸ In Türkiye, while prior authorisation is not required, for peaceful and lawful purposes,²⁹ organisers must notify local authorities at least two working days before the planned date of the event.³⁰ Decisions by local authorities (e.g. governors) to ban or suspend assemblies³¹ can be challenged through annulment proceedings in administrative courts, but these follow general procedural rules without special or expedited processes designated for such cases.³² Courts may issue a “stay of execution” to suspend the contested measure if (i) it risks irreparable harm and (ii) it is manifestly unlawful.³³ However, there are no strict time-limits for such decisions, allowing significant delays.³⁴
11. The framework permits authorities to ban or suspend events up to the planned date, effectively denying an a priori remedy that could enable timely judicial review.³⁵ In practice

²¹ Sever (n 17), p. 16.

²² Ibid.

²³ Diken, ‘ODTÜ’de Onur Yürüyüşü’ne çağrı: Rektörlük yasakladı, öğrenciler kararlı’ (10 May 2018), <https://www.diken.com.tr/odtude-onur-yuruyusune-cagri-rektorluk-yasakladi-ogrenciler-kararli/>; Kaos GL, ‘Hükümet’ten ODTÜ Onur Yürüyüşü yanıtı: “Rektörlük yasakladı, ayrımcı değiliz”’ (16 April 2020), <https://kaosgl.org/haber/hukumet-ten-odtu-onur-yuruyusu-yaniti-rektorluk-yasakladi-ayrimci-degiliz/>; Kaos GL, ‘Devlet LGBTİ+’lara savaş açtı: 37 günde 10 yasak, en az 530 gözaltı’ (27 June 2022), <https://kaosgl.org/haber/devlet-lgbti-lara-savas-acti-37-gunde-10-yasak-en-az-530-gozalti/>; Kaos GL, ‘Onur Ayı kronolojisi: Yasaklar, LGBTİ+’ları Durduramadı’ (14 July 2023), <https://kaosgl.org/haber/onur-ayi-kronolojisi-yasaklar-lgbti-lari-durduramadi/>.

²⁴ Kaos GL, ‘Devlet LGBTİ+’lara savaş açtı: 37 günde 10 yasak, en az 530 gözaltı’ (n 23).

²⁵ ÜniKuir, ‘Polisler ve güvenlikler, Mimar Sinan Üniversitesindeki LGBTİ+’lar’ı ablukaya aldı!’ (28 June 2024), <<https://www.unikuir.org/haberler/polisler-ve-guvenlikler-mimar-sinan-universitesindeki-lgbti-lar-i-ablukaya-aldi-28-06-2024>>.

²⁶ ÜniKuir Association, ‘Discrimination and Violations of Rights Against LGBTI+ In Universities’ for the Year 2022 (March 2023) and for the Year 2023 (February 2024); Joint Rule 9.2 submission by 33 NGOs and Bar associations (n 8).

²⁷ Amnesty International, ‘Türkiye: Istanbul Pride showdown highlights threat to LGBTI rights’ (23 June 2023), <https://www.amnesty.org/en/latest/news/2023/06/turkiye-istanbul-pride-showdown-highlights-threat-to-lgbti-rights/> (The former Commissioner for Human Rights underlining the intensified crackdown on right to freedom of peaceful assembly).

²⁸ ECtHR, *Bączkowski and Others v. Poland*, No. 1543/06, 3 May 2007, para. 82

²⁹ Article 3 of Law no. 2911 on Meetings and Demonstrations.

³⁰ Article 10 of Law no. 2911 on Meetings and Demonstrations.

³¹ In virtue of Articles 17 and 20 of Law no. 2911, together with Article 11 (c) of Law no. 5442 on Provincial Administration.

³² Sever (n 17), pp. 18-19. .

³³ Article 27(2) of the Procedure of Administrative Justice no. 2577.

³⁴ Sever (n 17), p. 23.

³⁵ Ibid., p. 20. On the need for an effective *a priori* remedy in relation to a refusal to authorise a planned event or demonstration, see ECtHR, *Bączkowski and Others v. Poland*, No. 1543/06, 3 May 2007, para. 83; *Alekseyev v. Russia*, No. 4916/07 and 2

LGBTI+ events are often banned just days or hours before their start, precluding meaningful recourse.³⁶ In addition, administrative courts rarely issue “stay of execution” decisions in these cases,³⁷ as demonstrated by bans on LGBTI+ events in major cities, where courts have rejected or not ruled on such requests.³⁸ The outcome of these proceedings reveal a lack of consistency and coherence in the approach of administrative courts. Cases by LGBTI+ groups are often dismissed at first instance and, in rare cases of success, resolved on appeal only after years, rendering remedies untimely.³⁹ Even when appellate courts lift bans, lower courts continue to uphold similar measures, accepting vague justifications from authorities without addressing applicants’ arguments or Article 11 standards.⁴⁰ Ultimately, annulment proceedings fail to ensure that LGBTI+ events occur, as authorities ignore rulings or impose new bans on similar events, making the process ineffective.⁴¹

12. In addition, the practice of the Turkish Constitutional Court (TCC) raises questions about the effectiveness of the individual application remedy before this court in similar cases. Applications challenging arbitrary bans or suspensions are often been dismissed as inadmissible⁴² or subjected to protracted delays,⁴³ showing a lack of engagement with ECtHR jurisprudence.⁴⁴ This reflects the TCC’s broader reluctance to substantively address discrimination and rights violations against LGBTI+ groups or to apply international standards.⁴⁵ These shortcomings are compounded by the TCC’s lack of independence, with

others, 21 October 2010, paras. 97-100; *Lashmankin and Others v Russia*, Nos. 57818/09 and 14 others, 7 February 2007, paras. 342-361.

³⁶ For instance, the Izmir Governor’s Office issued a ban on 14 June 2019 for Pride Week related events and demonstrations scheduled for 17 to 23 June 2019; the Istanbul Governor’s Office banned a picnic in a park for Pride Week just hours before the planned event on 22 June 2021; on 4 July 2023, the Antalya Governor’s office announced the ban of events planned for Pride Week from 3 to 9 July 2023.

³⁷ Sever (n 17), p. 5; Rule 9.2 Communication from NGOs (30/07/2024) concerning the case of *Oya Ataman v. Turkey* (Application No. 74552/01) (Ataman group, 46252/99), 1507th meeting (September 2024) of the Committee of Ministers, para. 15, [https://hudoc.exec.coe.int/eng#%7B%22execidentifier%22:%5B%22DH-DD\(2024\)893E%22%5D%7D](https://hudoc.exec.coe.int/eng#%7B%22execidentifier%22:%5B%22DH-DD(2024)893E%22%5D%7D).

³⁸ Ibid.; Sever (n 17), pp. 21 and 23.

³⁹ For example, the 2017 blanket ban on events and demonstrations organised by LGBTI+ organisations in Ankara was upheld at the first instance and lifted only on appeal in 2019 (Ankara Regional Administrative Court 12th Chamber, Docket no. 2019/93, Decision no. 2019/306, 21 February 2019); the 2019 ban on the Pride march in Izmir was upheld at the first instance and lifted on appeal in 2020 (Izmir Regional Administrative Court, Docket no. 2020/845, Decision no. 2020/1916, 24 December 2020); the 2021 ban on a picnic planned for Pride Week in Istanbul was upheld in the first instance and lifted only on appeal, more than two years after the events (see <https://spod.org.tr/spod-ve-istanbul-lgbti-onur-haftasi-2021-macka-parki-yasagina-dair-davayi-kazandi/>).

⁴⁰ E.g., Decision of 31 May 2021 by the 10th Administrative Court of Istanbul dismissing an annulment request concerning an indefinite ban on a play in Istanbul (Docket no. 2021/346, Judgment no. 2021/815). See also Sever (n 17), pp. 20-21.

⁴¹ For instance, despite the annulment in 2020 of the general ban on LGBTI+ events in Ankara, the Ankara Pride March of 2022 was shut down by police forces and participants were arrested (<https://bianet.org/haber/lgbti-lar-aciklama-yapmasin-diye-kugulu-park-kapatildi-264177>). In Izmir, despite the regional administrative court’s decision of 2020 to lift the ban on events for the 2019 Pride week, events were once again banned for the 2023 Pride week (<https://bianet.org/haber/izmir-valiligi-onur-haftasi-etkinliklerini-yasakladi-280808>). The METU administration continued to impose bans on Pride marches in the university campus despite the administrative court decisions annulling the bans in 2019, 2022 and 2023. See also <https://www.amnesty.org/en/latest/news/2024/05/turkiye-discriminatory-restrictions-and-violence-against-pride-protesters-must-not-be-repeated/>.

⁴² Rule 9.2 Communication from NGOs (SPoD and others) (n 17), paras. 16-17 and Sever (n 17), pp. 23-25.

⁴³ Kaos GL’s application regarding the ban of the march against homophobia in Ankara that year was adjudicated six years later (Constitutional Court, *Kaos GL Derneği (3)* [GK], App. No. 2016/11193, 20 October 2022); an application filed in 2022 by SPoD concerning administrative courts’ rejection of a request to suspend the execution of a ban in Istanbul that year remains pending (App. no. 2022/93578).

⁴⁴ Constitutional Court, *Kaos GL Derneği (3)* [GK], App. No. 2016/11193, 20 October 2022. See the dissenting opinions of judges Zühtü Arslan, Hasan Tahsin Gökcan, Engin Yıldırım, M. Emin Kuz, Yusuf Şevki Hakyemez and Kenan Yaşar.

⁴⁵ E. g., In *Z.A.*, concerning the dismissal of a gay teacher on the basis that he had acted in a “shameful and embarrassing way unfit for a civil servant” (including consensual same-sex relations), the majority of the TCC found no violation of the prohibition of discrimination and the right to private life, despite an absence of evidence other than the applicant’s sexual

its composition dominated by appointees of the ruling coalition.⁴⁶ Since 2015, increasing anti-LGBTI+ political rhetoric⁴⁷ has further undermined the judiciary’s impartiality and eroded the rule of law,⁴⁸ leaving systematic violations of LGBTI+ rights without effective remedies.

IV. Other practices preventing LGBTI+ individuals from exercising their rights under Articles 10 and 11

Police violence and arbitrary detentions during LGBTI+ assemblies

13. In Türkiye, peaceful protestors face risk of police violence and arbitrary arrest, particularly during LGBTI+ assemblies and events. Pride marches and university-based LGBTI+ activities are routinely and arbitrarily declared “unlawful” by authorities,⁴⁹ followed by systematic police dispersal despite their peaceful nature.⁵⁰ Police interventions often involve excessive and life-threatening force, constituting ill-treatment or torture.⁵¹ Protestors are frequently arrested and detained in large numbers and subjected to further abuse in custody.⁵²
14. Data from the Human Rights Foundation of Turkey (HRFT) reveals systemic violations of LGBTI+ groups’ right to peaceful assembly.⁵³ Between 2015 and 2019, 31 such violations were recorded, with increasing violence in 2019. This trend has worsened post-pandemic, with authorities showing decreasing tolerance for peaceful demonstrations and escalating violent interventions.⁵⁴
15. HRFT reports document the following: (i) 2020: At least 18 peaceful assemblies were met with excessive force, leading to the detention of 164 individuals.⁵⁵ (ii) 2021: Interventions increased to 22 assemblies, resulting in 191 detentions.⁵⁶ (iii) 2022: Police intervened in 7 Pride Marches, detaining 526 people, including 34 minors.⁵⁷ (iv) 2023: 11 Pride-related events saw 241 detentions, including 4 minors and 7 lawyers.⁵⁸ (v) 2024: On Pride March Day in Istanbul, 23 people were detained.⁵⁹ Data from the HRFT’s “Treatment and

orientation (App. no. 2013/2928, 18 October 2017). It failed to discuss the stigmatisation of and negative stereotypes against LGBTI+ persons.

⁴⁶ See Third Party Intervention of TLSP, HRW, and ICJ in *Osman Kavala v Türkiye (no. 2)*, No. 2170/24, paras. 16-18, <https://www.turkeylitigationssupport.com/blog/2024/11/1/joint-ngo-statement-osman-kavala-marks-7-years-behind-bars>.

⁴⁷ See e.g. <https://www.amnesty.org/en/latest/news/2024/05/turkiye-discriminatory-restrictions-and-violence-against-pride-protesters-must-not-be-repeated/>

⁴⁸ On the influence of the ruling political coalition over the judiciary, see Third Party Intervention of TLSP, HRW, and ICJ in *Osman Kavala v Türkiye (no. 2)* (n 46).

⁴⁹ See Section II.

⁵⁰ Joint Rule 9.2 submission by 33 NGOs and Bar associations (n 8) paras. 18-23.

⁵¹ Ibid; IHD, ‘İnsan Hakları Eylem Planı Çerçevesinde LGBTI+ Hakları ve Hak İhlalleri Raporu’ (n 16) pp. 26-27.

⁵² Joint Rule 9.2 submission by 33 NGOs and Bar associations (n 8) para. 48.

⁵³ HRFT, ‘Sokağı Kapatmak: Toplanma ve gösteri özgürlüğüne yönelik ihlaller (2015-2019)’ (2021),

https://tihvakademi.org/wp-content/uploads/2021/05/Yurttaslik_Alani_Bilgi_Notu_2.pdf.

⁵⁴ HRFT, Treatment and Rehabilitation Centers Report 2021 (April 2022), p. 67.

https://en.tihv.org.tr/wp-content/uploads/2022/09/HRFT_Treatment_and_Rehabilitation_Centers_report_2021.pdf.

⁵⁵ HRFT, ‘Türkiye İnsan Hakları Raporu 2020’ (June 2021), pp. 234-237, <https://tihv.org.tr/yillik-insan-haklari-raporlari/2020-yillik-insan-haklari-raporu>.

⁵⁶ HRFT ‘Türkiye İnsan Hakları Raporu 2021’ (September 2022), pp. 218-223, <https://tihv.org.tr/yillik-insan-haklari-raporlari/2021-yillik-insan-haklari-raporu>.

⁵⁷ Ibid; HRFT ‘2022 Onur Ayı Etkinliklerine Yönelik Hak İhlalleri’ (June 2022), <https://tihv.org.tr/ozel-raporlar-ve-degerlendirmeler/2022-onur-ayi-etkinliklerine-yonelik-hak-ihlalleri>.

⁵⁸ Ibid. Detained lawyers were present for legal support and observation during the Izmir LGBTI+ Pride March. They were beaten and detained in violation of the Law on Attorneyship; HRFT ‘Bilgi Notu: 2023 Onur Ayı Etkinliklerine Yönelik Hak İhlalleri’ (July 2023), <https://tihv.org.tr/ozel-raporlar-ve-degerlendirmeler/bilgi-notu-2023-onur-ayi-ihlaller>.

⁵⁹ HRFT ‘Bilgi Notu: 2024 Onur Ayı Etkinliklerine Yönelik Hak İhlalleri’ (July 2024),

Rehabilitation Centers Reports” since 2016 confirms a rising trend in torture and ill-treatment during police intervention at peaceful protests:⁶⁰

Year	Total Applications	Tortured/Ill-Treated	LGBTI+ Applications (%)	Detained Due to Gender (%)	Torture at Peaceful Protests (%)
2016	487	438	1 (0.2%)	3 (0.7%)	272 (56%)
2017	616	576	0 (0%)	1 (0.17%)	215 (38%)
2018	584	533	0 (0%)	1 (0.18%)	221 (44%)
2019	908	838	0 (0%)	0 (0%)	309 (37%)
2020	605	563	6 (1%)	10 (2%)	229 (41%)
2021	984	883	37 (4%)	23 (3%)	417 (48%)
2022	1201	1078	43 (4%)	39 (4%)	546 (51%)
2023	781	731	63 (9%)	53 (7%)	365 (50%)

16. Most LGBTI+ applicants to HRFT Treatment and Rehabilitation Centers reported experiencing torture and ill-treatment during police intervention in peaceful demonstrations, assemblies and marches.⁶¹ They were disproportionately subjected to physical violence, including reverse and tight handcuffing and rough beating,⁶² as well as sexual harassment, at rates higher than non-LGBTI+ applicants.⁶³

17. Observations also indicate that police frequently target LGBTI+ protesters or individuals displaying pro-LGBTI+ symbols, such as rainbow or pride flags, even at unrelated assemblies. Since 2019, Women for Women’s Human Rights has documented police interventions during women’s rights demonstrations, including International Women’s Day and the International Day for the Elimination of Violence Against Women, where pro-LGBTI+ protesters were singled out. Police blocked their access to assemblies, arrested them with excessive force, and subjected them to ill-treatment in custody, often exposing them to greater violence and harsher detention conditions than other protesters.

Judicial harassment of LGBTI+ protest participants

18. In Türkiye, bans on assemblies and police violence are compounded by the systematic use of criminal sanctions and fines against participants of peaceful LGBTI+ demonstrations, particularly Pride marches.⁶⁴ Criminal cases are routinely filed against activists, amounting to judicial harassment intended to deter the exercise of freedom of expression and assembly.⁶⁵ Between 2015 and 2023, at least 800 individuals were detained in Istanbul due to bans on LGBTI+ marches and events. Although all charges under Law No. 2911 resulted

<https://tihv.org.tr/ozel-raporlar-ve-degerlendirmeler/2024-onur-ayi-bilgi-notu>. It is thought that the decrease in the intensity of the violations observed in 2024 is due to the fact that Pride Week Committees’ of Istanbul and Ankara decided to hold Pride Marches in locations different than those of previous years in order to mitigate the possibility of law enforcement intervention. See SPoD and HRFT, ‘22nd Istanbul Pride March Observation Report’, <https://spod.org.tr/wp-content/uploads/2024/08/SPoD-HRFT-Observation-Report.pdf>

⁶⁰ These annual reports contain the anonymized data of those who applied to the Treatment and Rehabilitation Centers of the HRFT. The reports can be accessed on <https://en.tihv.org.tr/treatment-and-rehabilitation-reports>. Beginning from 2019.

⁶¹ 83% of the LGBTI+ applicants in 2020, 78.4% of the LGBTI+ applicants in 2021, 92.5% of the LGBTI+ applicants in 2022, and 100% of the LGBTI+ applicants in 2023. See in detail, HRFT, ‘Treatment and Rehabilitation Centres Report 2020’ (June 2021), p. 127, <https://en.tihv.org.tr/treatment-and-rehabilitation-reports/2020-hrft-treatment-centers-report>; HRFT, ‘Treatment Centres Report 2021’ (April 2022) (n 54) p. 137; HRFT, ‘Treatment and Rehabilitation Centres Report 2022’ (August 2023), p. 148, <https://en.tihv.org.tr/treatment-and-rehabilitation-reports/2022-treatment-centres-report/>; HRFT, ‘Treatment and Rehabilitation Centers Report 2023’ (November 2024), p. 115.

⁶² HRFT, ‘Treatment Centres Report 2021’ p. 138-139; ‘Treatment Centres Report 2022’, p. 149-150; ‘Treatment Centres Report 2023’, p. 118. However, in 2020, the numbers were similarly high ‘Treatment Centres Report 2020’, p. 128.

⁶³ Ibid.

⁶⁴ Joint Rule 9.2 submission by 33 NGOs and Bar associations (n 8) para. 60.

⁶⁵ Rule 9.2 - Communication from NGOs (SPoD and others) (n 17), para. 24.

in acquittals,⁶⁶ these prosecutions create a chilling effect on the right to freedom of assembly, violating Article 11 of the Convention.

Disciplinary actions against university students

19. Universities have increasingly targeted students detained during Pride marches with disciplinary investigations, leading to the suspension of scholarships and student loans, often in defiance of domestic legislation.⁶⁷ These measures are applied even when Pride marches occur off-campus.⁶⁸ Although students frequently succeed in overturning these disciplinary actions through administrative lawsuits, the practice persists, undermining students' rights and contravening domestic law.⁶⁹

Administrative harassment of LGBTI+ rights associations

20. Associations and activists advocating for LGBTI+ rights in Türkiye face systemic administrative harassment. The Ministry of Interior has conducted frequent audits and inspections without prior justification.⁷⁰ For example, Kaos GL was audited four times, ÜniKuir three times, Gender Identity and Sexual Orientation Studies Association twice, and May 17 Association once.⁷¹ Following these audits, Kaos GL and May 17 Association were fined for alleged 'irregular charitable aid abroad'.⁷²
21. In June 2021, a smear campaign against Tarlabası Community Center, triggered by a pro-government journalist targeting an LGBTI+ rights event, led to audits by the Provincial Directorate of Civil Society Relations.⁷³ The center's chairperson was fined approximately \$8,350. In February 2022, the Istanbul Prosecutor's Office, based on a Governorate report, filed for the association's dissolution, accusing it of "influencing the sexual identity of children" and suspended its activities for two months.⁷⁴ The trial is ongoing.⁷⁵
22. LGBTI+ advocacy clubs at universities also face severe restrictions. Of 208 universities in Türkiye, only 12 (two public) have granted official status to such clubs. Recently, Boğaziçi and Hacettepe Universities closed their LGBTI+ advocacy clubs, with Boğaziçi's decision upheld in court and Hacettepe's case still pending. Efforts to establish LGBTI+ clubs at

⁶⁶ Rule 9.2 - Communication from NGOs (SPoD and others) (n 17) para. 25.

⁶⁷ Ibid para. 31. Article 18 of the Scholarship Directive of the Ministry of Youth and Sports regulates limited circumstances that may lead to the termination of the scholarship. Among these situations, situations such as the detention of the student or the opening of an investigation against the student are not regulated as a reason for the termination of the scholarship. In case of a finalized conviction with a prison sentence of one year or more for a crime committed deliberately, the sanction of termination of the scholarship can be applied. However, in practice, students' scholarships and student loans are cut off solely on the basis of being detained.

⁶⁸ ÜniKuir, 'Discrimination and Violations of Rights Against LGBTI+ in Universities: for the 2022 Year, (March 2023), pp. 34-36, https://drive.google.com/file/d/1ltHoQnxtLZ67gesC7wLfoP2CYKk6WsOg/view?usp=drive_link.

⁶⁹ Ibid. See e.g. the decisions of Ankara 3. Regional Administrative Court (2022/2127, 2023/57) and Ankara 7. Regional Administrative Court (2022/2331) annulling these disciplinary measures.

⁷⁰ Solidarity Network for Human Rights Defenders (*İnsan Hakları Savunucuları Dayanışma Ağı*), 'Written Contribution on the Situation of Human Rights Defenders to the 4th Cycle of the Universal Periodic Review of Republic of Türkiye' (10 October 2024) para. 66.

⁷¹ Ibid. para. 70.

⁷² Ibid. para. 71 (The payments described as aid were actually dues payments to international umbrella organisations and royalty payments of foreign universities. Administrative fines were imposed on four different chairpersons of these associations. One of the appeals by the May 17 Association has been accepted, while no decision has been made regarding the other).

⁷³ Ibid para. 72; See also Sesiz Kalma, Tarlabası Toplum Merkezi (last review 20 August 2024)

<https://www.sessizkalma.org/tr/savunucu/tarlabasi-toplum-merkezi>

⁷⁴ (n 70) para. 40.

⁷⁵ Ibid.

Ege University and METU have been outright rejected by university administrations.⁷⁶

Hateful discourse by state officials and politicians

23. In recent years, anti-LGBTI+ rhetoric has become increasingly prominent among Türkiye's state officials and politicians. Government officials have openly targeted LGBTI+ individuals, particularly in the context of Pride marches and police violence at LGBTI+ assemblies. Firstly, Government officials openly targeted LGBTI+s in the context of Pride marches and police's excessive use of force during LGBTI+ assemblies. Interior Minister defended police actions during the 2023 Trans Pride March, labelling demonstrators as "occupying mentalities" who disregard "the values of our society."⁷⁷ The former Minister frequently referred to LGBTI+ individuals as "perverted" and accused them of spreading "terrorist propaganda."⁷⁸ President Erdoğan has also compared the LGBTI+ community to "fascism," claiming it represents societal corruption surpassing "tyranny."⁷⁹
24. Governors banning LGBTI+ assemblies have used similar rhetoric, with the Izmir governor calling such events "against the values of society"⁸⁰ and Gaziantep's governor referring to them as "perverted events."⁸¹ Complaints against these statements, including one filed with the Human Rights and Equality Institution of Turkey (TİHEK), were dismissed on the grounds that discrimination based on sexual orientation and gender identity is not covered by the institution's mandate.⁸² Ankara's 5th Administrative Court upheld this decision.⁸³
25. According to HRFT, hateful rhetoric from authorities has fuelled violence against the LGBTI+ community and intensified crackdowns on their right to freedom of assembly, particularly after Türkiye's withdrawal from the Istanbul Convention.⁸⁴

V. Discriminatory nature of Turkish authorities' practices targeting LGBTI+ individuals

26. Despite international obligations to protect LGBTI+ individuals from discrimination, violence, and unequal treatment, with the ECtHR emphasising heightened obligations to safeguard their rights and ensure equality, the patterns identified above and below demonstrate systemic failures by Turkish authorities to uphold these obligations:

Discriminatory Bans: LGBTI+ events have been systematically banned or suspended since 2015, while pro-government gatherings (e.g., political rallies or anti-vaccination

⁷⁶ There has been an administrative case brought against the decision of rejection of the demand by the Ege University. İzmir Administrative Court rejected the case on the grounds that the University administration's decision was made within the scope of their discretionary powers (İzmir 8. Administrative Court, 2023/368, 2024/793).

⁷⁷ Kaos GL, 'Yerlikaya is on Soylu's track: He defended police torture at Trans Pride March' (25 June 2023), <https://kaosgl.org/en/single-news/yerlikaya-is-on-soylu-s-track-he-defended-police-torture-at-trans-pride-march>.

⁷⁸ Kaos GL, 'İçişleri Bakanı senenin ilk yarısında her ay ama her ay LGBTI+ yurttaşları hedef aldı' (4 July 2022), <https://kaosgl.org/haber/icisleri-bakani-senenin-ilk-yarisinda-her-ay-ama-her-ay-lgbti-yurttaslari-hedef-aldi>; Duvar English, 'In new hate speech, Turkish Interior Minister Soylu deems LGBTI+ 'cultural terrorism'' (13 November 2022), <https://www.duvarenglish.com/in-new-hate-speech-turkish-interior-minister-soylu-deems-lgbti-cultural-terrorism-news-61530>.

⁷⁹ Duvar English, 'In new hate speech, Turkey's Erdoğan says "imposition of LGBT" turns into "tyranny", surpassing 'even fascism'', <<https://www.duvarenglish.com/in-new-hate-speech-turkeys-erdogan-says-imposition-of-lgbt-turns-into-tyranny-surpassing-even-fascism-news-64460>>.

⁸⁰ Yavuz Selim Koşger, X, 2023. <https://x.com/yskosger/status/1669770233496698880>.

⁸¹ Kaos GL, 'Antep Governor targeted LGBTI+'s, LGBTI+'s receive death threats' (19 June 2022), <https://kaosgl.org/haber/antep-valisi-hedef-gosterdi-lgbti-lara-olum-tehditleri-gelmeye-basladi>.

⁸² Kaos GL, 'The court acquitted TİHEK and the Governor of discrimination' (4 December 2023). <https://kaosgl.org/en/single-news/the-court-acquitted-tiheke-and-the-governor-of-discrimination>

⁸³ Ibid.

⁸⁴ The Turkish government and its supporters have said the Convention threatens "family values" and "normalises homosexuality".

protests) were permitted under comparable conditions.⁸⁵ Authorities cite safety concerns but fail to address counter-demonstrators' threats. In contrast, bans are often accompanied by discriminatory statements⁸⁶ and large anti-LGBTI+ demonstrations, such as the 2023 "Big Family Meeting," were openly supported and promoted.⁸⁷

Escalating Violence: Police have increasingly used excessive force, arbitrary arrests, and ill-treatment against LGBTI+ demonstrators. Reports since 2015 reveal a deliberate state policy targeting LGBTI+ rights, with mounting cases of torture and abuse during peaceful events.⁸⁸

Lack of Effective Remedies: Authorities have systematically denied effective remedies against arbitrary bans and discriminatory practices, failing to meet their positive obligations under international law.⁸⁹

Hateful Rhetoric: State officials, including high-ranking politicians, have portrayed LGBTI+ identities as "immoral" and "perverse", normalising discrimination and intensifying violations.⁹⁰

27. The crackdown on LGBTI+ rights is part of a broader effort to suppress dissent and dismantle democratic safeguards in Türkiye. This campaign further erodes the fundamental rights of LGBTI+ individuals and groups,⁹¹ violating Türkiye's international obligations,⁹² including Article 14 of the Convention, which prohibits discrimination in the enjoyment of Convention rights.⁹³

VI. Conclusion

28. Systematic and targeted restrictions by Turkish authorities on LGBTI+ rights events reveal how restrictive domestic legislation on freedom of peaceful assembly has been used to disrupt the activities of human rights defenders and civil society - key pillars of a democratic society. Domestic remedies have repeatedly proven inadequate and ineffective to address systematic violations of the rights to assembly, association, and expression.
29. These restrictions reflect a broader anti-LGBTI+ political agenda and sit alongside widespread and increasing violations of the rights of LGBTI+ persons and defenders of LGBTI+ rights in Türkiye. The deliberate and discriminatory nature of these sustained attacks underscores the urgent need for a robust supervision and assessment of compliance with international human rights standards.

⁸⁵ Sever (n 17), p. 16.

⁸⁶ See Section IV.

⁸⁷ Kaos GL, 'LGBTI+ march banned, anti-LGBTI+ hate march allowed', 2022, <https://kaosgl.org/haber/lgbti-larin-yurumesi-yasak-lgbti-dusmani-nefret-yuruyusu-serbest>; Kaos GL, 'Cities mobilising in anti-LGBTI+ hate politics', 2022, <https://kaosgl.org/haber/lgbti-karsiti-nefret-siyasetinde-nobetlesen-sehirler>.

⁸⁸ See Section IV. See also <https://www.hrw.org/news/2022/08/02/pride-month-turkey-showcased-homophobia-resistance>.

⁸⁹ See Section III.

⁹⁰ See <https://www.hrw.org/news/2021/02/18/turkey-student-protesters-risk-prosecution>.

⁹¹ See <https://www.amnesty.org/en/documents/eur44/8049/2024/en/>; <https://www.hrw.org/news/2022/08/02/pride-month-turkey-showcased-homophobia-resistance>. In 2024, the association ILGA ranked Turkey 46th out of 48 countries in Europe and Central Asia for LGBTI+ rights (<https://rainbowmap.ilga-europe.org/countries/turkey/>).

⁹² See https://www.ohchr.org/sites/default/files/Documents/Publications/Born_Free_and_Equal_WEB.pdf

⁹³ The ECtHR has found violations of Article 14 of the Convention due to authorities' refusal to allow LGBTI+ events in a range of cases where it found evidence of unequal treatment without objective and reasonable justification, including where express disapproval was expressed by an official with influence over the authorisation process (*Bączkowski and Others v. Poland*, No. 1543/06, 3 May 2007, para. 100; *Alekseyev and Others v. Russia*, Nos. 4916/07, 25924/08, and 14599/09, 21 Dec. 2010, para. 109), or where other types of events were approved during the same period, the authorities provided multiple and inconsistent justifications for refusing to allow the event, and they implicitly disapproved of LGBTI+ events (*Genderdoc-M v. Moldova*, No. 9106/06, 12 June 2012).