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**REPUBLIC OF TURKEY
ANTALYA CITY
SUPREME REPUBLICAN PUBLIC PROSECUTORS' OFFICE**

	<u>DETAINEE</u>
INTERROGATION NUMBER:	2010/206480
CAUSE NUMBER:	2010/22672
BILL OF INDICTMENT NUMBER :	2010/1037

**BILL OF INDICTMENT
TO THE CRIMINAL COURT OF ANTALYA CITY**

COMPLAINANT: K.N.
SUFFERERS: 1 – ILONA KUDENTSOVA, the daughter of NIKOLAY and KHATIDGE, date of birth: 10/09/1990, resides at the address: Apt. 17, 46 Podemnaya St., Moscow, Russian Federation
2 – KSENIYA GLADKOVA, the daughter of VYACHESLAV and ELENA, date of birth: 29/02/1992, resides at the address: 24/2 Prospect A. Nevskogo, Perm, Russia
3 – TARASIK ALEXANDRA, the daughter of LEONID and OLGA, date of birth: 10/08/1989, resides at the address: 28/76 1 Kirpichnaya St., Moscow, Russia
4 – CHRISTINE ZHUKOVA, the daughter of CONSTANTINE and TATYANA, date of birth: 26/11/1989, resides at the address: 4 Pervomaysky Blvd., Novosergievsky district, Krasnodar, Russia
5 – LUDMILA BATYAIKINA, the daughter of OSTAP and MARINA, date of birth: 16/02/1992, resides at the address: Apt. 32, 27 Solnechnaya St., Saransk, Russia
6 – CHRISTINE KOLESNIKOVA, the daughter of VICTOR and SVETLANA, date of birth: 26/12/1988, resides at the address: Apt. 404, 254 A Melnikova St., Rostov-on-Don, Russia
7 – LILIA BOBROVSKA, the daughter of IGOR and LARISA, date of birth: 07/08/1987, 1/23 Druzhby St., Lugansk, Ukraine
8 – VALERIA PRISTUPA, the daughter of SERGEY and ZHANNA, date of birth: 31/08/1988, 88/13 40 let Sovetskoy Ukrayny St., 69000 Zaporozhye, Ukraine
9 – ALBINA PERTSEVA, the daughter of SERGEY and SVETLANA, date of birth: 25/08/1992, 2 Zoologicheskaya St., Moscow, Russia
10 – VASILISA SAVATEEVA, date of birth: 20/03/1994, citizen of the Russian Federation, passport N 63, series: 4919630, resides in Moscow

11 – STEFANIYA RUSCHIKOVA, date of birth 07/01/1994, citizen of Germany, passport 64 N 1547830, resides in Moscow

12 – KSENIYA ZAKHAROVA, date of birth: 02/04/1993, citizen of the Russian Federation, passport N 63, series: 897428, resides in Moscow

SUSPECT: 1 – TEVFIK ARIF, the son of MURTAZA and GEVER, date of birth: 15/05/1953, registered at the address: ISTAMBUL city, district BESHIKTASH, settlement ARNAVUTKEY, series 2, family registration number 1458, number 1, resides at the address: ISTAMBUL ciy / BESHIKTASH, Arnavutkey, Kyultyur Makhalle Kerkady St., villa Panorama, N 3; **detained on charge, at the “L” type prison in the city of Antalya**

INDICTMENT: Trade in human beings, involvement in, inducement or aiding and abetting to prostitution, traffic in juveniles under 18, creation of criminal organization with the purpose of commission of crime

PLACE AND DATE OF CRIME: 2009, ANTALYA / CENTRE

DATE OF DETENTION: under the order number 2010/102 as of 02/10/2010 issued by the Criminal Court of Antalya city

CLAUSE NUMBER: Criminal Code of Turkey 80/1-3, Criminal Code of Turkey 220/1, Criminal Code of Turkey 227/2-6, clauses 53 and 63 of the Code of Criminal Procedure

SUSPECT: 2 – MUSA CHELIK, the son of ARIF and FATMA, date of birth: 01/04/1972, registered at the address: KASTAMONU city, district CHATALZEYTIN, settlement DURAN, series 14, family registration number 4, number 87, resides at the address: ANTALYA city, district Bogazkent, settlement Serik, Sarykent Tatil citecy, N 5; **detained on charge, at the “L” type prison in the city of Antalya**

INDICTMENT: Trade in human beings, involvement in, inducement or aiding and abetting to prostitution, traffic in juveniles under 18, membership in the criminal organization created with the purpose of commission of crime

PLACE AND DATE OF CRIME: 2009, ANTALYA / CENTRE

DATE OF DETENTION: 02/10/2010, under the order number 2010/102 as of 02/10/2010 issued by the Criminal Court of Antalya city

CLAUSE NUMBER: Criminal Code of Turkey 80/1-3, Criminal Code of Turkey 220/2, Criminal Code of Turkey 227/2-6, clauses 53 and 63 of the Code of Criminal Procedure

SUSPECT: 3 – EKATERINA MAISURADZE, the daughter of ROMANI and LAMARA, date of birth: 21/12/1980, registered at the address: city, district, settlement, series, family registration number, number, resided at the address: ANTALYA, Centre, Leather Clothing Store Mondial lawyer MUSTAFA KYOKCHE, ANTALYA

DEFENCE : Antalya city, Centre, Meltem Makhallecy, Basyn Citecy, Block N 27

INDICTMENT: Trade in human beings, membership in the criminal organization created with the purpose of commission of crime

PLACE AND DATE OF CRIME: 2009, ANTALYA / CENTRE

CLAUSE NUMBER: Criminal Code of Turkey 80/1-3, 39, Criminal Code of Turkey 220/2, clauses 53 and 63 of the Code of Criminal Procedure

SUSPECT: 4 – KEMAL TOKAY, son of ALI RZA and SALIMA, date of birth: 25/12/1969, registered at the address: SIVAS city, district SHARKYSHLA, settlement GYUMYUSHTEPE, series 52, family registration number 247, number 26, resides at the address: ANTALYA, Aksu, 111 Pynarly Makhalle St. N 12, apartment 3

INDICTMENT: Involvement in, inducement or aiding and abetting to prostitution, membership in the criminal organization created with the purpose of commission of crime

PLACE AND DATE OF CRIME: 2009, ANTALYA / CENTRE

CLAUSE NUMBER: Criminal Code of Turkey 220/2, Criminal Code of Turkey 227/2-6, clauses 39, 53 and 63 of the Code of Criminal Procedure

SUSPECT: 5 – ELDAR BAYOGLYEV, the son of NYUDEYBERDI and SHERIFA, date of birth: 14/08/1984, registered at the address: city, district, settlement, series, family registration number, number, resides at the address: ISTANBUL city / Arnavutkey, Kyultyur Makhalle Kerkady St., villa Panorama, N 3; **detained on charge, at the “L” type prison in the city of Antalya**

INDICTMENT: Trade in human beings, involvement in, inducement or aiding and abetting to prostitution, traffic in juveniles under 18, membership in the criminal organization created with the purpose of commission of crime

PLACE AND DATE OF CRIME: 2009, ANTALYA / CENTRE

DATE OF DETENTION: 02/10/2010, under the order number 2010/102 as of 02/10/2010 issued by the Criminal Court of Antalya city

CLAUSE NUMBER: Criminal Code of Turkey 80/1-3, Criminal Code of Turkey 220/2, Criminal Code of Turkey 227/2-6, clauses 53 and 63 of the Code of Criminal Procedure

SUSPECT: 6 – ERKAN AKDENIZ, the son of DZHEVAT and SEIMA FATMA, date of birth: 04/09/1976, registered at the address: ORDU city, district CENTRALNY, settlement OGMADZHA, series 72, family registration number 46, number 144, resides at the address: ANTALYA city / Muratpasha, Gyuzeloba Makhalle Ozeller Street, Ali Khakan citecy, block A, the 8-th floor, N 17; **detained on charge, at the “L” type prison in the city of Antalya**

INDICTMENT: Trade in human beings, involvement in, inducement or aiding and abetting to prostitution, traffic in juveniles under 18, membership in the criminal organization created with the purpose of commission of crime

PLACE AND DATE OF CRIME: 2009, ANTALYA / CENTRE

DATE OF DETENTION: 02/10/2010, under the order number 2010/102 as of 02/10/2010 issued by the Criminal Court of Antalya city

CLAUSE NUMBER: Criminal Code of Turkey 80/1-3, Criminal Code of Turkey 220/2, Criminal Code of Turkey 227/2-6, clauses 53 and 63 of the Code of Criminal Procedure

SUSPECT: 7 – KHULYA ERDOGAN, the daughter of SUAT and NEZAKHAT, date of birth: 01/04/1967, registered at the address: MALATYA, district CENTRALNY, settlement, series 12, family registration number 54, number, resides at the address: ANTALYA city / Centre, Gendzhelik Makhalle Street, Malzumbek house N 3, the 2-nd floor, apartment 15; **detained on charge at the “L” type prison in the city of Antalya**

DEFENCE : lawyer ZAFER MEIDAN, ANTALYA
Antalya city / Muratpasha, Meltem Makhallecy, Meltem Bulvary, Birlik House, N 5/17

INDICTMENT: Trade in human beings, involvement in, inducement or aiding and abetting to prostitution, membership in the criminal organization created with the purpose of commission of crime

PLACE AND DATE OF CRIME: 2009, ANTALYA / CENTRE

DATE OF DETENTION: 02/10/2010, under the order number 2010/102 as of 02/10/2010 issued by the Criminal Court of Antalya city

CLAUSE NUMBER: Criminal Code of Turkey 80/1-3, Criminal Code of Turkey 220/2, Criminal Code of Turkey 227/2-6, clauses 53 and 63 of the Code of Criminal Procedure

SUSPECT: 8 – GYUNDYUZ AKDENIZ, the son of FARKHAD and RABIA, date of birth: 23/01/1960, registered at the address: ORDU city, district CENTRALNY, settlement OGMADZHA, series 72, family registration number 46, number 81, resides at the address: ISTANBUL / Gaziosmanpasha, 836 Mevlana Makhalle Street, N 15, apartment 3; **detained on charge at the “L” type prison in the city of Antalya**

INDICTMENT: Trade in human beings, involvement in, inducement or aiding and abetting to prostitution, creation of criminal organization with the purpose of commission of crime, creation of traffic in juveniles under 18

PLACE AND DATE OF CRIME: 2009, ANTALYA / CENTRE

DATE OF DETENTION: 02/10/2010, under the order number 2010/102 as of 02/10/2010 issued by the Criminal Court of Antalya city

CLAUSE NUMBER: Criminal Code of Turkey 80/1-3, Criminal Code of Turkey 220/2, Criminal Code of Turkey 227/2-6, clauses 53 and 63 of the Code of Criminal Procedure

SUSPECT: 9 – EBU BEKIR SYDDYK TEKIN, the son of GUSEIN and SABIKHA, date of birth: 17/08/1978, registered at the address: ELAZIG city, district ALADZHAKAYA, settlement CHATAKLY, series 16, family registration number 26, number 20, resides at the address: ANTALYA city / Centre, 1328 Street, Citeler Makhalle, Gyulvesen citecy, Block C, 3/6 Undzhaly

DEFENCE : lawyer ALI KUSH, ANTALYA
Antalya city / Centre, Etiler Makhallecy, Evliya Chelebi Street, Business Centre Mirador, N 3, the 8-th floor, apartment 47
lawyer Ramazan Kachar, ANTALYA
Antalya city / Serik, Ataturk St., Merkez Makhalle 2140, Business Centre Karakaya N 1, the 4-th floor, apartment 7

INDICTMENT: Involvement in, inducement or aiding and abetting to prostitution

membership in the criminal organization created with the purpose of commission of crime

PLACE AND DATE OF CRIME: 2009, ANTALYA / CENTRE

CLAUSE NUMBER: Criminal Code of Turkey 220/2, Criminal Code of Turkey 227/2-6, clauses 39, 53 and 63 of the Code of Criminal Procedure

SUSPECT: 10 – VEISI AVDZHY, the son of ZEKA and GYUZEL, date of birth: 10/09/1981, registered at the address: VAN city, district MURADIYE, settlement KESHK KEYU, series 26, family registration number 1, number 89, resides at the address: ANTALYA city / Centre, Barynakalar Bulvary Chakhlayn Makhalle Street, Ishleyen house, apartment 12

Involvement in, inducement or aiding and abetting to prostitution

PLACE AND DATE OF CRIME: 2009, ANTALYA / CENTRE

CLAUSE NUMBER: Criminal Code of Turkey 227/2, clauses 39, 53 and 63 of the Code of Criminal Procedure

EVIDENCE: Link-following and revelation, acts of listening, sound CDs, technical video filming and CDs with the materials of observation, search acts, acts of physical surveillance, banking records, registration of airplane tickets, used and not used means for sexual aims, witnesses' testimonies, suspects' evidence, sufferers' evidence, acts of printed computer and mobile phone records, certificates of experts, the whole content of the case history.

Records of interrogation have been examined

Gendarmerie received information that Musa Chelik and Gunduz Akdeniz, are engaged in encouragement of prostitution, providing rich clients of prestige hotels with high class minor foreign citizens.

Detailed investigation resulted in evidence against Musa Chelik and Gunduz Akdeniz, confirmed their international ties with the organized criminal group. In order to collect evidence and identify the guilty parties, the victims were freed and monitoring and audio interception was executed with regards to contacts of Musa Chelik and Gunduz Akdeniz.

The process of monitoring and audio interception of contacts resulted in the establishment of the fact that the activities of the criminal group are financed by a person called Tevfik Arif, and also that the following persons have been also involved in the activities of the criminal group: Eldar Baiyogliev, Erkan Akdeniz, Hulya Erdogan, Ekaterian Maisuradze and Kemal Tokai. Monitoring and audio interception of contacts has also been established with regards to the above mentioned person.

As a result of identification of contacts and audio interception, it was found that the women are brought from abroad by Musa Chelik and Gunduz Akdneiz, under the instructions from Gunduz Akdeniz ,who in turn implements the requirements of Tevfik Arif. In addition, it was established, that Gunduz Akdeniz is directly involved in "supplying" the women from abroad, in assuring their hotel accommodation, their visits to yachts and transportation across Turkey. Money, received through the use of foreign female citizens in prostitution and their sale,

was divided between Gunduz Akdneiz, Erkan Akdeniz and Musa Chelik, as confirmed by the interbank monetary transfers and records of audio interception;

Connection between Musa Chelik, engaged in the transportation of foreign females from abroad as under the instruction from Gunduz Akdeniz, and Hulya Erdogan, nickname "Buse", has been established as with regards of the latter organizing the transportation of females within the country, as under the instruction from Gunduz Akdeniz, according to the identified contacts and the results of audio interception it was established that Hulya Erdogan is engaged in the transportation of women with an aim of engaging them in prostitution;

The results of monitoring and audio interception show that the organized criminal group was engaged in human trafficking and encouragement and aid of prostitution and assuring locations for prostitution, also that in the process of its systematic activity, aimed at preventing the interpretation of their activity, the suspects used code names of «Guest», «Contract», «Passenger», «Three people», «Savings», «Mannequin», «Model», etc., as established and affixed by the acts in proof of engagement of activity of the criminal group on human trafficking, encouragement and aid of prostitution and assuring locations for prostitution;

According to the information recorded during audio interception it was also established that during negotiations Tevfik Arif was referred to as the «Boss », and his assistant Gunduz Akdeniz was referred to as the «Uncle»;

The results of monitoring and audio interception show that the organized criminal group was engaged in trafficking women from Russia and Ukraine through the use of modeling agencies and other similar companies; also that the contacts and connections were established under the instruction and requests, received by the suspects, mainly from Tevfik Arif and that after Erkan Akdeniz, Musa Chelik and Eldar Baiyogliev would choose the photos of the victim women, granted to them by the modeling agencies through the internet as part of a specific organization and hierarchy of exchange of information; that in accordance to the instructions from Gunduz Akdeniz, Eldar Baiyogliev would purchase flight tickets for the arrival and departure of women; that the transportation of the victim women from the Turkish airport was conducted by Kemal Tokai in compliance to the instructions received from Gunduz Akdeniz; that the establishment of contacts and transportation of women from abroad was partially conducted by Ekaterian Maisuradze, mistress of Erkan Akdeniz, who also spoke good English and Russian; that Hulya Erdogan, engaged in the affairs of the criminal group, aided and actively participated in its activities, participated in transportation of women to Turkey, allegedly for participation in events and performances; that the suspects first of all preferred that the transported women would first of all be physically beautiful, would preferably have modeling background and possessed other languages in addition to their native language, and that they would fully comply with the requirements of the leader of the criminal group, and if some of the brought in women did not meet the requirements of the persons receiving sexual services, than such women would be sent back to their countries on the same day, with members of the criminal group purchasing the return tickets, as established by the records on monitoring contacts and technical surveillance, airline tickets, documents used to book the tickets and e-mail correspondence.

According to the information, identified during the audio interception it was also established that the suspects would bring in minor girls, those who have not reached the age of 18, with an aim of sale and engagement in prostitution, that prior to the girls' arrival their names, age and looks would be discussed over the phone (height, hair color, eye color, etc.) and after establishing an agreement with the sending agencies, and the approval of the girls through the consideration of their photos, the suspects would organize the arrival of girls to Turkey, with direct participation of Gunduz Akdeniz, Eldar Baiyogliev, Musa Chelik and Erkan Akdeniz as under the instructions from Tevfik Arif;

According to the record on identification of contacts № 73, the conversation dated 03/02/2010, held between Gunduz Akdeniz and Musa Chelik, Gunduz Akdeniz informs Musa Chelik, that there is a scheduled event for the 15th and the 16th date of the month, to which the Boss will arrive with his friends, and therefore 4 girls will need to attend this event; Musa Chelik said that he already requested

the photos of two girls that will come to see him. Gunduz Akdeniz, meaning the photo of the girls from the internet, asks, is her name «Natasha»,

Musa Chelik tells him that the girl is from another agency, which is not suited to their needs, he also says that the 16-17 year olds are now 1000 USD each, that the girls are very beautiful, winners of beauty contests, that there is one girl by the name of Julia, who, after losing her virginity, offer sexual pleasures for money only once; Gunduz asked him how beautiful the girls are, and demands that the existing girls are replaced for the ones described, to which Musa Chelik says that the new girls are too expensive, that only for one day they would cost 1000 USD, and that its best that he keeps these girls for himself; later, on 02/03/2010, he calls a woman by the name of Vasilisa, engaged in transporting the girls from Russia, and according to the record on identification of contacts № 75, tells her, that he needs 4 girls aged 16, to which Vasilisa replies, that she has posted their “photos on the website”, then Musa once again asks to send photos of Lena and Alesya, and Vasilisa says that she posted the photos of Lena and Kristina; later Musa Chelik contacts Mine Bilir and books 4 tickets for the girls, Gunduz Akdeniz calls and asks Musa Chelik to report on the state of affairs with the transportation of girls, to which Musa Chelik replies that he is in the middle of organizing everything.

On 04/03/2010 Gunduz Akdeniz again calls Musa Chelik and talks about the girls' photos, he says that he posted the photo on the first page, the photo of «Vasilya, the one who is 15», then, after calling a second time, asks Musa Chelik, whether Vasilya's friends will come, to which Musa says that they will probably come, since they work as a group; after Gunduz Akdeniz checks the photos, on 05/03/2010, Musa Chelik asks him, «Uncle, there is one more, Viktoria, can we have her too?» to which Gunduz Akdeniz replies that the boss demands more photos of better looking girls, then Musa sends more photos, received from Russia, to Gunduz Akdeniz, and tries to reach an agreement on girls that are scheduled to arrive;

The conversation held between Musa Chelik and Gunduz Akdeniz, dated 09/03/2010, refers to the sending of a passport copy to Vasilisa, about the fact that the girl is 16 and that she is beautiful, and that a total of 4 girls are scheduled to arrive; the fact that Eldar Baiyogliev (Edka) called Musa Chelik and received the information of the arrival of the girls, and that Musa Chelik called Vasilisa, telling here that he was not clear on all the matters mentioned during their conversation and asked for translation aid, to understand exactly what she wanted.

According to the record on identification of contacts № 111, it is established that Gunduz Akdeniz, on 11/03/2010, called Musa Chelik again, and that the conversation touches upon the arrival of the girls, Gunduz Akdeniz asks Musa Chelik «Is Vasilisa coming on the 15th or the 16th?», to what Musa Chelik answers that she is coming on the 15th, and that another 3 girls are coming with her – Alasya, Kusya and Vika, and that one of the girls did not get a permission from her mother, then Gunduz Akdeniz asks to send him the names of the girls so he can book rooms in the “Rixos” hotel.

According to the record on identification of contacts № 114, it is established that Gunduz Akdeniz, on 12/03/2010, called Musa Chelik , and asks the following during the conversation «One thing crossed my mind, is there any information on the height of the girls?», to which Musa Chelik replies «Sure, one girl is 1,75, if I remember correctly the other is 1,72, that is Vasilisa who is 1,72 , and Alasya – 1,75», he also adds that Gunduz should not worry about the girls, that he sent the website address to Eldar, and that he already received the rights for the domain www.mod-optimal.gmail, then they continued the conversation on the arrival of the girls; according to the record on identification of contacts № 118, it is established that during the conversation dated 12/03/2010, Gunduz Akdeniz asks that the age of the girls was below 17-18 years, and Musa Chelik replies that the girls are 16-17, and Gunduz Akdeniz asks how much will they have to pay the girls;

During the following conversation Gunduz Akdeniz tells Musa Chelik, «in the other case we give girls 1000, and this time I will raise the price to 1500, since the girls are 16, and it is difficult to find 16 year olds, I will tell them that the girls will come only when they will pay», to what Musa Chelik replies «that's right Uncle» and that boss's friend – shasha pays slightly more to the girls, and that the girls that come to him

are a better choice, since they get 3000.

According to the records on identification of contacts № 119,120, 121 it is established that the conversations refer to the provision of girls aged below 18 years, the conversation recorded in the record on identification of contacts № 122 dated 12/03/2010 , shows that Gunduz Akdeniz asks Musa Chelik about the girls that are scheduled to arrive, he particularly asks Musa Chelik the following, «Nastya, who is 18, the one with large breasts, wearing a blue dress, very beautiful, do you have her surname?», to which Musa replies that he has no surname, he only has a photo, and that only Vasilisa and Viktoria are coming, then Gunduz Akdeniz enquired further about the girls called Natalya (16) and Lariya (16); during a conversation, dated 13/03/2010, held between Gunduz Akdeniz and Musa Chelik, Gunduz asks what should he tell the boss – Tevfik Arif- about the arriving girls, to what Musa Chelik says «I am sending you Pisusha, 16 years old, Alasya, she is 18, but I wrote that she is 17. Here is Pisusha, on the website the information states that she is 17-18 years old, but she is 16», Gunduz Akdeniz replies «We'll tell the boss that one is 16 and the other is 17», to which Musa adds that «Vasilya is not 16 yet, she will be 16 on the 20th»

On 13/03/2010, Musa Chelik has a telephone conversation, this time with Eldar Baiyogliev (Edka), Eldar tells him that he spoke with the girls, Musa gives him the information about the girls who are scheduled to arrive, he also says that he sent him a photo of Tanya, who is 17, also of Julia, Marina, Katya, Ivanna and Tasya, and tells him that Tasya is also coming, he says that the girls are all very beautiful and that they should all come, to which Eldar replies «I am not sure, Gunduz is the one calling the shots», thus it was established that the decision on the arrival of the girls to Turkey is adopted by Gunduz Akdeniz.

On 14/03/2010, Gunduz Akdeniz again calls Musa Chelik, and receives information on the arriving girls, their age, height, Musa says that the following should arrive: Tatya and Maria, who are both 18, Tasya - 17, and that Tasya has an innocent baby face, further conversations again dwell on the subject of height and other attributes of the girls.

According to the record on identification of contacts № 133 it is established that during the conversation dated 14/03/2010, held between Musa Chelik and a woman by the name of Vasilisa, who provided him with the girls, Musa Chelik requests that the fourth girl should be Marina Letkova, to what Vasilisa says ok, «but listen, maybe Julia too, I mean I do not know Marina Letkova, I do not know what kind of person she is». Musal Chelik replies «no, I sent 5 photos to the client, and from them e chose only Marina and Tasya. But Tasya is a little too short. He liked Marina, and he no longer wants Julia ». Then Vasilisa expressed her desire to send Julia's photos, and said that Julia is 20. Then Musa Chelik talked to Eldar about the arrival of the girls, the reception of their passports, and their accommodation in the hotel. Subsequently, through the audio interception of the suspects, it was established that the girls arrived in Antalya on 15/03/2010. From the conversation dated 15/03/2010, held between Musa Chelik and Gunduz Akdeniz, it was established that one of the arriving girls was 15 and the others are 17 years of age. Then the conversation was held about the fact that the girls who are 15-16 years old could make great profit, and that in Russia they are sold at 5000-6000 US dollars; then Gunduz Akdeniz order Kemal Tokai to meet the girls in the airport, Musa Chelik also called Kemal Tokai, and warned him that he wants to talk to Vasilya as soon as she arrives. At the same moment it is recorded that Gunduz Akdeniz called Musa Chelik once again and requested one more girl.

According to the records on identification of contacts № 149 and 152 it is established that during the conversation dated 15/03/2010, Musa Chelik talks about a 17 year old girl, praising her, and Gunduz Akdeniz says that if she does arrive they will ask for 1500 US dollars, and the conversation held with Erkan Akdeniz mentions that this girl «Natasha» is 16 years old.

It is established that on 15/03/2010, at around 20:43, Gunduz Akdeniz called Musa Chelik, and informed him that he is in the «Rixos» hotel, room number 1513, and he is waiting for Musa Chelik

Turkish Republic

Antalya

Criminal Court No.3

The case is considered with the suspected persons being under arrest

PRELIMINARY HEARING PROTOCOL

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It has been established from the conversations between the suspected persons that the girls had been accommodated in the rooms of the Rixos hotel, and in room No. 1526 were the girls hired earlier by Musa Chelik (Муса Челик);

Gyundyuz Akdeniz (Гюндюз Акдениз), Eldar BAYOGLIEV (Элдар БАЙОГЛИЕВ) and Erkan Akdeniz (Эркан Акдениз) acted in confederacy to arrange for the delivery of women, which were delivered at the request of Tevfik Arif (Тевфик Ариф);

Besides:

From Protocol of Phone-Tapping No. 10 of the conversation made on March 9, 2010 at 4:21 p.m. from the GSM standard telephone device with the number 0 532 213 97 71 belonging to Gyundyuz AKDENIZ:

From the SMS: "if you have time, new photos will be in half an hour";

From Protocol of Phone-Tapping No. 13 of the conversation made on March 10, 2010 at 10:07 p.m. from the GSM standard telephone device with the number 0 532 213 97 71 belonging to Gyundyuz AKDENIZ:

.....

Gyundyuz Akdeniz: **all guests will also go there.**

Tevfik Arif: where from?

Gyundyuz Akdeniz: **those who are from Igor.**

Tevfik Arif: **there was only the 16th.**

Gyundyuz Akdeniz: ... **there is the 16th, but she said she can't go alone, she will go together with the 19th contract.**

Tevfik Akdeniz: Okey, let her go.

it was established that there had also been the delivery of girls under 18, as is seen from the above conversation;

Besides, it was established that Tevfik Arif was especially interested whether the girls were in a delicate condition or not;

Besides,

From Protocol of Phone-Tapping No. 32 of the conversation made on March 15, 2010 at 6:46 p.m. from the GSM standard telephone device with the number 0 532 213 97 71 belonging to Gyundyuz AKDENIZ:

Tevfik Arif: what is the matter, what is happening? Tell me.

Gyundyuz Akdeniz: do you mean the guests?

Tevfik Arif: what is happening at all? I know nothing.

Gyundyuz Akdeniz: ... the guests are arriving, tomorrow evening **Mr. Moskovich** will arrive.

Tevfik Akdeniz: when will the guests arrive?

Gyundyuz Akdeniz: the plane will arrive in a little while, there must be four.

Tevfik Arif: umph, umph

Gyundyuz Akdeniz: oh, sorry, five must arrive now.

Tevfik Arif: who are they from?

Gyundyuz Akdeniz: **now two are from Sasha.**

Tevfik Arif: umph, umph

Gyundyuz Akdeniz: three are from the new agency.

Tevfik Arif: and those two from **Sasha** are the former ones, aren't they?

Gyundyuz Akdeniz: no, the former ones will arrive at 1 a.m.

Tevfik Arif: I see, he sent the new ones.

Gyundyuz Akdeniz: yes, tomorrow two will arrive from **Sasha**.

Tevfik Arif: Okey.

Gyundyuz Akdeniz: he said that one more will arrive the day after tomorrow, there is one new, this is the fifth, he said.

All right.

it has been established that, in accordance with the requirements of Tevfik Arif, the women delivered from Russia had been brought to Antalya, and, in order to confirm this fact, a technical surveillance was conducted on the basis of the decision of the court concerning technical surveillance whereby it was established that on March 15, 2010 at 7:23 p.m. the women-victims delivered to Antalya Airport by Musa Chelik were met by Kemal TOKAY (Кемал ТОКАЙ) who brought them to Rixos Premium Belek;

In the course of the road control carried out by the Gendarmerie in the suburb of Belek at about 8 p.m. on March 15, 2010 with the purpose to establish the identities of the women of foreign citizenship whom Kemal TOKAY met and accompanied in Antalya Airport and with the purpose to expose the crime it was established that the victims are: **the under-age citizen of Russia Vasilisa SAVATEEVA (Василиса САВАТЕЕВА) of 1994, the under-age citizen of Germany Stefaniya RUSHIKOVA (Степания РУШИКОВА) of 1994, the under-age citizen of Russia Kseniya ZAKHAROVA (Ксения ЗАХАРОВА) of 1993, the citizen of Russia Olesya MOSKALETS (Олеся МОСКАЛЕЦ) of 1992, and the citizen of Russia Veronika DANILINA (Вероника ДАНИЛИНА) of 1991**, whereof the protocols and technical snapshots have been made and the victims under this fact have been photographed;

According to the list of the guests received from the Rixos Premium Belek hotel, in order to establish the crime and prove the exploitation of the under-age girls of foreign citizenship for sexual purposes and also to correlate this fact with the protocols of phone-tapping, it was established that, despite the availability of snapshots from the camera showing the departure of the under-age foreign victim girls to the hotel by Kemal TOKAY in a black Mercedes Vito van with the number plate 07 AIR 70, there are no names of the above victims in the registration book of the hotel.

In the course of study of the notes of entry into and exit from the country of **the under-age citizen of Russia Vasilisa SAVATEEVA of 1994, the under-age citizen of Germany Stefaniya RUSHIKOVA of 1994, the under-age citizen of Russia Kseniya ZAKHAROVA of 1993, the citizen of Russia Olesya MOSKALETS of 1992, and the citizen of Russia Veronika DANILINA of 1991**, it was established that Olesya Moskalets had arrived in Turkey on March 15, 2010 to Ataturk Airport in Istanbul and departed on March 16, 2010 from the airport.

Besides,

From Protocol of Phone-Tapping No. 152 of the conversation which took place on March 16, 2010 at 11:14 a.m. between Gyundyuz Akdeniz and Musa Chelik: "**we will send that unpretty back, the plane is taking off at half past one**", it was established that they had intended to send back the girl which they didn't like — OLESYA MOSKALETS.

In the course of interrogation of Kemal TOKAY who participated in transportation, purchase of tickets for and delivery of the women under 18, which were brought by Kemal TOKAY to the Rixos hotel in a black Mercedes Vito van with the number place **07 AIR 70**, the interrogated confirmed these

circumstances and said that on the eventful day he had met the girls in the airport; the girls were stopped by the Gendarmerie who were carrying out road control, and the passports of the girls were checked; then the girls were taken to the hotel at the direction of Gyundyuz Akdeniz and were registered in the hotel, but he said he didn't know how this registration had been made.

As a result of surveillance it was established that on March 15, 2010 at about 8 p.m. during the check of the passengers of the Mercedes Vito van driven by Kemal TOKAY with the number plate 07 AIR 70 carried out by the Gendarmerie, the citizens of Russia **Olesya Moskalets**, passport 63 No. 8762881, **Kseniya Zakharova**, passport 63 No.8977428, **Vasilisa Savateeva**, passport 63 No. 4919630, **Veronika Danilina**, passport 70 No. 3081565, and **Stefaniya Rushikova**, passport 64 No. 1547830, were heading for the hotel Rixos Premium Belek; however, in the course of the check of the registration book of the hotel guests received on March 16, 2010 from Rixos Premium Belek it was established that the above women, which had been taken to the hotel, were not registered and did not stay in Rixos Premium, besides, there were no entries evidencing the stay in Rixos Premium of Gyundyuz Akdeniz, Tevfik Arif and Eldar Bayogliev, who had delivered the girls from abroad, and this fact is mentioned in the protocol of March 16, 2010 made by the authorized persons of the police department of Belek;

Meanwhile, from Protocol of Phone-Tapping No. 151 of the conversation conducted through a mobile and a fixed phone indicating the place of the conversation between Gyundyuz Akdeniz and Musa Chelik of March 15, 2010 it was established that Musa Chelik went to Rixos Premium, asked Gyundyuz Akdeniz where the latter was, whereon Gyundyuz Akdeniz answered: "come, come into 1513", whereby giving to understand that he was in room number 1513; also on March 16, 2010 he mentioned that one of the women who had talked to Musa Chelik was accommodated in room 1526 and that Eldar Bayogliev was also in the hotel on that day;

After the operational actions had been carried out, the list of guests of Rixos Premium Belek for March 15, 2010 was again requested on September 30, 2010, and in the course of study of the list of guests sent by the management of the hotel it was established that the member of the organized criminal group Tevfik Arif had stayed in room 1501 from March 15, 2010 till Mach 20, 2010 and Eldar Bayogliev stayed in room 1505 from March 15, 2010 till March 20, 2010;

It was established that Gyundyuz Akdeniz was not entered in the guest list sent on March 16, 2010 by the management of the hotel to the General Prosecutor's Office of the republic, while according to the guest list which was sent again by the management of the hotel (Rixos Premium Belek) to the General Prosecutor's Office after the operational actions and which includes the dates from March 15, 2010 till March 21, 2010, there are notes of multiple arrivals to the hotel of the suspected Gyundyuz AKDENIZ, including:

Date of arrival:	Time of arrival:	Date of leave:	Time of leave:	Room:
March 15, 2010	3:32 p.m.	March 21, 2010	12:34 p.m.	1513
March 15, 2010	8:03 p.m.	March 20, 2010	5:08 p.m.	1507
March 15, 2010	8:05 p.m.	March 20, 2010	5:19 p.m.	1518

March 16, 2010	4:02 p.m.	March 20, 2010 5:19 p.m.	1506
March 16, 2010	4:02 p.m.	March 20, 2010 4:10 p.m.	1511
March 16, 2010	4:14 p.m.	March 20, 2010 8:19 a.m.	1525
March 16, 2010	7:01 p.m.	March 21, 2010 12:34 p.m.	1455
March 17, 2010	12:03 p.m.	March 20, 2010 5:09 p.m.	1508

As a result of study of the guest lists of the hotel in whole and for earlier dates, it was established that the suspected persons had not provided for official registration of the women delivered to the country as part of their criminal activity but **ensured the dwelling of the under-age girls delivered from abroad in hotels, concealed their identities** and sold them to rich clients — these actions were just one of the systems applied by the organized criminal group, as is evidenced by the documents of the hotel — as you can see from the list, **Gyundyuz Akdeniz arrived at the hotel eight times within the three days (15th, 16th and 17th of March 2010), and left the hotel six times on one and the same day (March 20, 2010) and two times on March 21, 2010;**

The suspected Gyundyuz Akdeniz was given the rooms 1507, 1508, 1511, 1513, 1518, 1525, 1455 for the period from March 15, 2010 till March 21, 2010, while actually he stayed in room 1513 and in other rooms stayed the delivered women;

Besides,

from Protocol of Phone-Tapping No. 158 between Musa Chelik and Gyundyuz Akdeniz which was taken place on March 16, 2010, it was established as follows: Gyundyuz Akdeniz said to Musa Chelik, “**Did you check those my guests in at the administrator**”, Musa Chelik answered, “**Yes**”, Gyundyuz Akdeniz, “**Why do you check them in, didn’t I tell you to get the keys at the hall**”, in the course of discussion Musa Chelik explained that he did what he was said to do, but, anyway, the receptionist required personal details of the girls, and he said that they are his uncle’s (Gyundyuz Akdeniz) guests, and administrator explained that personal details are required under issuing of an invoice, and they must provide them, whereon Gyundyuz Akdeniz was angry, and asked, why these details were required; Musa Chelik answered him, “**I said about them, but he gave them a blank to fill in, began to fill it in, I got it from his hands and wrote your name. They must have filled it, but I didn’t allow them, wrote your name only and then returned the blank**; i.e. at the reception of the hotel personal details were required for registration of women brought from abroad, and Musa Chelik stated, that they are the guests of Gyundyuz Akdeniz; then the girls were given hotel blanks to fill in, and, when they wanted to fill them in, Chelik got them and wrote the name of Gyundyuz Akdeniz only;

After discovery of supply of the girls younger than 18 years old to the country by an organized criminal group with the purpose of prostitution as a result of examination of the documents conducted by Gendarmerie on March 15, 2010, establishment of absence of registration of under-age girls at under examination of automated system according to the Law on Provision of Personal Details at Rixos Premium Belek, regardless of residence of Tevfik Arif, Gyundyuz Akdeniz, and Eldar

Bayogliev at the same hotel, after confirmation of this fact by examination of the list of guests received upon request of Police Department of Belek on provision of the list of guests as of March 15, 2010, i.e. after establishment that **suspected persons are the members of an organized criminal group, and under-age girls were not registered at the list of hotel guests, leak of information on preliminary investigation occurred in respect of the suspected persons, and the suspected persons were warned that supply of girls younger than 18 years old with the purpose of prostitution would cause many problems;**

According to Protocol of Phone-Tapping No. 142 from discussion of Gyundyuz Akdeniz on telephone 0 532 213 97 71 and from telephone 0 530 692 42 38 used by Tevfik Arif and on discussion made on April 26, 2010, it was also established that:

Gyundyuz Akdeniz: Hello

Tevfik Arif: Hello

Gyundyuz Akdeniz: Everything goes on, is ok

Tevfik Arif: hm, hm, by the way... **Sasha** must have been sent, must have been sent 16th contacts (it is meant the age) of 3-4 persons, 1 or 2 there

Gyundyuz Akdeniz: I don't understand, to Antalya?

Tevfik Arif: yes, of course, you had, you said, from new agency, 16th contract there, 17th and 18th contracts from there, let 2-3 persons more come to talk, and agree where we should stay there.

Gyundyuz Akdeniz: where we should stay? at Premium.

Tevfik Arif: ask, if we come on the 1 of the month.

Gyundyuz Akdeniz: I'll ask, but let me send you a letter

Tevfik Arif: hm

Gyundyuz Akdeniz: in 2-3 days you will receive a letter on these issues, there is something, I'll tell you it in a letter, you read it in Russian language, and according to it we will organize the program.

Tevfik Arif: What a letter, why?

Gyundyuz Akdeniz: Hmm, it won't get to discuss it on the phone

Tevfik Arif: Aha, I understand, i.e. there is something that is discussed, yeah?

Gyundyuz Akdeniz: yes, and very much

Tevfik Arif: at Premium?

Gyundyuz Akdeniz: No, in general.

Tevfik Arif: have written somewhere?

Gyundyuz Akdeniz: he somebody came to him, something bad will happen there soon ...

Tevfik Arif: where is it?

Gyundyuz Akdeniz: in Antalya

Tevfik Arif: yeah

Gyundyuz Akdeniz: my telephone is being heard, all names and other information has been obtained

Tevfik Arif: hmm, hmm

Gyundyuz Akdeniz: of your friend, of other persons, of everybody

Tevfik Arif: hmm, hmm

Gyundyuz Akdeniz: we should not discuss it on the telephone

Tevfik Arif: I understand, I understand

GYUNDYZ AKDENIZ: WE ALSO MUST INCREASE (the increase means the girls' age increase) CONTRACTS, THE PROBLEM COMES FROM THERE

Tevfik Arif: ok, then temporarily suspend those programs

Gyundyuz Akdeniz: ok

Tevfik Arif: then we suspend everything, because I don't know if I have time

Gyundyuz Akdeniz: agreed

Tevfik Arif: in case it succeeds, we will change the program according to that

Gyundyuz Akdeniz: ok, I'll send you a letter, Fettah Bey...

Tevfik Arif: no, there is no need, we will not agree with anybody yet.

Gyundyuz Akdeniz: ok

Tevfik Arif: the guests shall have been arrived here, did they arrive?

Gyundyuz Akdeniz: where is it, to the island or where?

Tevfik Arif: but you said, the guests shall have been arrived here ... hello!

Gyundyuz Akdeniz: one girl came here yesterday

Tevfik Arif: I know it, we know it.

Gyundyuz Akdeniz: the other two girls – those whom you met yesterday

Tevfik Arif: no, I'm talking not of them, **Sasha** has already said that he will send somebody.

Gyundyuz Akdeniz: they will get to the plane tomorrow

Tevfik Arif: Ok, stop them too

Gyundyuz Akdeniz: ok, agreed

Tevfik Arif: we don't need them

Gyundyuz Akdeniz: ok, agreed

According to Protocol of Phone-Tapping No. 143 from discussion of Gyundyuz Akdeniz on telephone 0 532 213 97 71 and from telephone 0 530 692 42 38 used by Tevfik Arif and on discussion made on April 26, 2010, it was established as follows:

Tevfik Arif: when did you talk to them, when did it happen?

Gyundyuz Akdeniz: well, it has been observed, as it turns out, about a year or two already

Tevfik Arif: hmm

Gyundyuz Akdeniz: 2-3 days ago Fettah Bey came to Istanbul, talked to Vakyf Bey, told man-to-man

Tevfik Arif: aaa, good

Gyundyuz Akdeniz: there is somebody else among them, a model ...

Tevfik Arif: Understood... understood, ok

Gyundyuz Akdeniz: Ok

As it follows from the abovementioned discussions, after the officers of Gendarmerie Department have established the identities of under-age girls supplied from abroad, administrative officers of the hotel have told to Tevfik Arif that supply of these girls caused the problems, the same information was referred to his elder brother, Vakyf Arif and Gyundyuz Akdeniz, it was established that suspected persons after what happened refused of supply of girls younger than 18 years old with the purpose of prostitution to Turkey.

Besides;

According to Protocol of Phone-Tapping No. 81 made on March 29, 2010 at 4:09 p.m. from GSM telephone having number 0 532 213 97 71, that belongs to Gyundyuz AKDENIZ it was established as follows:

Tevfik Arif: what's happened, can you send that guest to that deal?

Gyundyuz Akdeniz: in 15-20 minutes we will know if he comes tomorrow

Tevfik Arif: fine

Gyundyuz Akdeniz: and also the girl who is on the 16th according to contract

Tevfik Arif: ok, we must suspend her, suspend

Gyundyuz Akdeniz: good

Tevfik Arif: we will get her later, also, it was Stephanie who came the previous time

Gyundyuz Akdeniz: **Stephanie**

Tevfik Arif: aha, aha.

Gyundyuz Akdeniz: **The girl who came to Antalya:**

Tevfik Arif: yes

Tevfik Arif: Sasha sent her

Gyundyuz Akdeniz: it was registered, I'll see, ok.

Tevfik Arif: **of course, she must be also involved, we will get her to Turks and Caicos**

Gyundyuz Akdeniz: **to Turks and Caicos?**

Tevfik Arif: to the island, to the island

Gyundyuz Akdeniz: **in a week, good**

Tevfik Arif: **to those islands, it is to the island**

Upon reminding to the suspected person on the abovementioned discussions and request, there is an EXPLANATION:

he answered that he does not remember them

According to the results of investigation conducted it was established that on March 15, 2010 in the territory of Belek, Antalya, Gendarmerie officers stopped and conducted passport check of underage girls sent to Rixos Hotel, Antalya, the content of the above telephone discussions provides that the members of an organized criminal group mention causing a problem of supply of girls younger than 18 years old and adopt a decision not to supply girls younger than 18 years old in prospect;

furthermore;

According to Protocol of Phone-Tapping No. 17 made on March 29, 2010 at 3:08 p.m. from GSM telephone having number 0 533 815 0066, that belongs to Erkan AKDENIZ, from content of discussion:

.....

Gyundyuz Akdeniz: **he doesn't want the 16th, he says, it will cause problems, he says, she is too young**

Erkan Akdeniz: **there are 19th**

Gyundyuz Akdeniz: **send me the pictures of those who can come tomorrow**

Erkan Akdeniz: **ok, there are three who are ready**

Gyundyuz Akdeniz: this one, this one may be sent, make arrangement with them

Erkan Akdeniz: **but, as far as I know, the 16 years old girl went to Miami, apparently, it was earlier, no, it's not important, forget it**

Gyundyuz Akdeniz: **he doesn't want, says that she won't go if there are 18-19 years old girls, you talk to them tomorrow, ask, if she can come, is it necessary to buy tickets, say to that girl too**

Erkan Akdeniz: **ready, ready, everybody is ready, I'll send you in the evening, three girls are ready**

It may be concluded, how the system operates, from this talking to Gyundyuz Akdeniz, from the words of Gyundyuz Akdeniz: “ **he doesn't want the 16th, he says, it will cause problems, he says, she is too young**” and **he doesn't want, says that she won't go if there are 18-19 years old girls, you talk to them tomorrow, ask, if she can come, is it necessary to buy tickets, say to that girl too**” it is clearly determined that Tevfik Arif already doesn't want to hire under-age suffered girls for work;

According to Protocol of Phone-Tapping No. 17 made on March 30, 2010 at 9:12 p.m. from GSM telephone having number 0 533 815 0066, that belongs to Erkan AKDENIZ, from content of discussion:

Erkan Akdeniz: **there is a 16 years old girl, very beautiful, uncle says it won't get**

Musa Chelik: **it won't get, your chief will get his fingers burnt, your chief will get his fingers burnt**

Erkan Akdeniz: 16 years old already were, she is already 17, and she went to America 4-5 times

Musa Chelik: **we will not give to the number something like that in prospect**

Erkan Akdeniz: **no, listen, I'll not give, there are also 16 and 15 years old girls, mine this one is crazy, electronic mail is full,**

it follows that the members of a criminal group named Erkan and Musa talk overtly on supply of under-age suffered girls from abroad and that electronic mail of Erkan is full of photographs of the suffered women, sent by foreign agencies under examination of data of computers which belong to the suspected persons, exempted in the course of the search as of the date of operative actions conduction, availability of many photographs of the suffered women of foreign citizenship was also established; it may be concluded from the content of the discussion that Tevfik Arif doesn't want to supply girls younger than 18 years old as a result of the leak of information to the suspected persons due to provision of the list of guests, received from the hotel by officers of Gendarmerie Department on under-age girls brought on March 15, 2010, which is confirmed by the words of Erkan Akdeniz given to Musa Chelik: "**there is a 16 years old girl, very beautiful, uncle (Gyundyuz Akdeniz) says it won't get**", and by the words of Musa Chelik, addressed to Erkan Akdeniz: "**it won't get, your chief (Tevfik Arif) will get his fingers burnt, your chief will get his fingers burnt**".

Combined actions of the members of an organized criminal group, Gyundyuz Akdeniz, Erkan Akdeniz, Eldar Bayogliev, Ekaterina Maysuradze, Musa Chelik, Kemal Tokay in supply of women from abroad, and also in delivery and transfer were established,

also,

According to Protocol of Phone-Tapping No. 24 made on April 20, 2010 at 11:37 a.m. from GSM telephone having number 0 532 215 7403, that was used by Eldar BAYOGLIEV, from content of discussion:

Eldar: no, tickets and other things have been sent to you, I would like to know, huh, height, age

Erkan Akdeniz: height is 1.75; age is 19

Eldar: aha, good

Erkan Akdeniz: you must have had the information, I sent you their photographs

Eldar: it was long ago, almost forgot it

Erkan Akdeniz: I will send you via email today, if you want;

According to Protocol of Phone-Tapping No. 57 made on April 29, 2010 at 4:36 p.m. from GSM telephone having number 0 532 215 74 03, that was used by Eldar BAYOGLIEV, from content of discussion:

905322157403 (Eldar): **Another program is being organized there. Another contract is required (the code assigned to a girl supplied). There will be another contract tomorrow at 5**

Tevfik Arif: **good, very good**

905322157403(Eldar): aha, aha

Tevfik Arif: let's do it, we'll see

905322157403(Eldar): Good luck..

Tevfik Arif: **tomorrow at 5, good, agreed, which contract?**

905322157403(Eldar): **No. 21**

Tevfik Arif: **ok, 21**

905322157403(Eldar): aha, aha

Tevfik Arif: **ok, it will be there or at another place?**

905322157403(Eldar): **it will be there again**

It was established that Eldar Bayogliev, Erkan AKDENIZ, Gyundyuz Akdeniz and Musa Chelik provided to Tevfik Arif some girls also for his personal needs, photographs of which were sent via computer to Eldar Bayogliev, and in the event that Tevfik Arif likes a girl, she is sent to that place he wants, the bill of indictment on maintenance of connection between the members of the criminal group indicates only some examples of discussions of the suspected persons, there were much more such discussions in practice;

According to Protocol of Phone-Tapping No. 1 made on July 26, 2010 at 8:33 p.m. from GSM telephone having number 0 5357 955 3135, that was used by Ekaterina Maysuradze, from content of discussion:

Erkan Akdeniz: I decided to send another girl, who is good

05379553135 (Eka): where?

Erkan Akdeniz: to Kazakhstan

05379553135 (Eka): aha

Erkan Akdeniz: then the girl was sent, she called and told she had no passport, had only identity card

05379553135 (Eka): There is Marina, send her

Erkan Akdeniz: now I'm sending her,

It was established that the suspected persons tell each other about position of the suffered girl sent to Kazakhstan and the problems occurred, Ekaterina Maysuradze is a friend of Erkan Akdeniz, by

reason of the problems which sometime arose, Ekaterina, due to good Russian language, could contact to women and help in problems solving.

According to Protocol of Phone-Tapping No. 2 made on July 26, 2010 at 8:35 p.m. from GSM telephone having number 0 5357 955 3135, that was used by Ekaterina Maysuradze, from content of discussion:

05379553135 (Eka): her photographs were sent in last turn, see them, ok? There is a very beautiful one

Erkan Akdeniz: yes, Katya, by the way, has been involved in other thing, she requires USD 1,000 per a girl each day, what's that, one thousand dollars...

It was established that Ekaterina was a member of the organized criminal group and knew what was happening;

It was established the fact that the person who sent women who came to the airport to Rixos Premium Belek Hotel as part of crime organization, was Kemal Tokay; Kemal Tokay on Mercedes-Benz Vito car c license plate 07 AIR 70 on instruction of Gyundyuz Akdeniz took the women from the airport in Antalya and got them to the hotel, furthermore:

According to Protocol of Phone-Tapping No. 11 made on May 03, 2010 at 04:29 a.m. from GSM telephone having number 0536 435 79 36, that was used by Kemal Tokay, from content of discussion:

Gyundyuz Akdeniz (9771): lock the car and get the girls here

Kemal Tokay (7936): where are you?

Gyundyuz Akdeniz (9771): here we are, we are at the reception room

Kemal Tokay (7936): ok

Gyundyuz Akdeniz (9771): here, downstairs

Kemal Tokay (7936): ok

Gyundyuz Akdeniz (9771): come from there, from there, this way will lead you right to the escalator, say them you are going to the party which is upstairs,

It was established that Kemal Tokay received the instructions from Gyundyuz Akdeniz on where to get the girls, i.e. the instruction to get them to the party where special clients are present, and the payment to him was made by Gyundyuz Akdeniz, besides:

According to Protocol of Phone-Tapping No. 15 made on May 25, 2010 at 11:10 a.m. from GSM telephone having number 0536 435 79 36, that was used by Kemal Tokay, from content of discussion:

Gyundyuz Akdeniz: **no, but we were going to send the money of that, well, the day before yesterday a girl of Erkan came**

Gyundyuz Akdeniz: **on the thirtieth of the month, month, one guest will come, you meet him and make transfer at premium**

and as a result of examination of invoices of both suspected persons it was established that money transfer was made which is confirmed by discussion of the suspected persons.

The fact that some of women who were delivered by the criminal group, according to hearing of telephone talkings were not liked and were sent back, but these girls received payments on instruction of Tevfik Arif, it was also established that,

According to Protocol of Phone-Tapping No. 64 made on March 23, 2010 at 4:26 p.m. from GSM telephone having number 0 532 213 9771, that belongs to Gyundyuz Akdeniz, from content of discussion:

Tevfik Arif: **there was, huh, non-used girl, pay to her**

Gyundyuz Akdeniz: **you go out good**

Tevfik Arif: **I will continue, you must see that nobody there, nobody..**

Gyundyuz Akdeniz: **ok, agreed, we will show several more, from these new will be ok?**

Tevfik Arif: **ok, ok**

Gyundyuz Akdeniz: **ok, agreed, we will see**

Tevfik Arif: **they must be good.**

Sale of women by the criminal group inside the country and abroad with the purpose of prostitution

It has been established that Musa Tchelik, a member of the organized criminal group, delivered women for prostitution to clients, both in Europe and America, for which purpose he carried on negotiations with the citizen of Russia, a woman named Olga, by way of sending SMS messages

from/to the phone number 0 531 681 38 37 used by him, including the message, sent on 20.02.2010 at 18:32 of the following content, “**my e-mail is modoptimal@gmail.com. For Europe we will pay 600 Euros, from 22nd till 27th day they will be in France, and you will be paid 500 dollars for the rendered assistance**”, the reply message “Good, I understood. I will send several beautiful brunette girls. How are you going to send money? Through Western Union?”, the reply message sent by Musa Tchelik of the following content, “No matter if the girls are brunettes or blondes but they should be beautiful. I’ll send through Western Union but I need to know your full name”, then the message sent by Olga of the following content, “My name is Olga Mazur, I will try to find girls as quickly as possible. Call me tomorrow”, the reply message, sent by Musa Tchelik later that day (20.02.2010) at 02:06 of the following content, “Nice to know you, Olga. My name is Musa, I am the Buy T agent. I send not only to Europe but also to London, America and Antalya. Antalya is on an on-going basis”, the message sent by Olga to Musa Tchelik of the following content,

“Do you want all models for sex? I should know it because many don’t agree for sex”,

the reply message sent by Musa Tchelik of the following content, “**Olga, client wants sex**”;

SMS message sent by Olga of the following content, “I’ll ask once again, I don’t take any commissions from models like others, 600 Euros per day for one model”,

then the message sent on 21.02.2010 by Musa Tchelik of the following content, “**Hello, Olga. We are waiting for the photos, when will you be able to send them?**”

the reply message sent by Olga of the following content, “I sent you one more photo, 19 years old”, the message from Musa, “yes, I send your photos to a client, he wants a model for 6-7 days, I hope he will choose you”, and subsequent messages about the photographs of girls, and beside that, the SMS message sent on 28.02.2010 about sending of two photographs of a 17-year old girl that later will send the photographs of the girls who will be sent to France; the last time he contacted her on request of Tevfik Arif on the issue of the girls arriving to Antalya on 15.03.2010, and Olga sent him SMS on 06.03.2010 of the following content, “Vasi will be in Antalya on March 15th”, and constantly was uploading photographs of new models for him;

Musa Tchelik worked with several model agencies in Russia and delivered model girls also with the help from a woman named Lena which fact has been established from SMS message, sent by Musa Tchelik on 07.03.2010 to a woman named Lena of the following content, “Olesya, Ksyusha, Lena send me all the names to buy a ticket. I need 3 or 2 models of 17 or 18 years old, is it possible?”

With the help from the agents from Russia with whom Musa Tchelik and Erkan Akdeniz had contacts, they were seeking models for Tevfik Arif for the night which should have taken place in Antalya on 15.03.2010. For this purpose, they carried negotiations with the agents, which fact has been established on the basis of the messages sent after these negotiations, including the message sent on 13.03.2010 to Musa Tchelik of the following content, “I sent 5 photos. Tasya, 17 years, very beautiful”, “Alyona Minina, passport No. 62 8091783 ING”, the message sent on 14.03.2010 of the following content, “On the party which will take place in the Rixos Premium Belek Hotel 10 models will take part”, the SMS message of the following content, “one pays 1,000 dollars, the other – 3,000 dollars, there will be two clients, each model will work only one or two times”,

On a constant basis Musa Tchelik was informing Gunduz Akdeniz about performed work, beside that,

Along with the girls prepared for 15.03.2010, on 16.03.2010 and 17.03.2010 some more girls were also delivered from Russia which fact is established from Musa Tchelik's message sent on 16.03.2010 to Gunduz Akdeniz of the following content, "Gunduz bey, the other model will arrive in 2-3 hours."

After studying the negotiations and messages it has been subsequently established that there were constant talks about the age and appearance (height, hair color, eyes color, age) of the girls and the amount of money paid to the girls for their work, compensation to agents, booking air tickets and about the girls who would be chosen and sent.

In the course of phone-tapping it has been established that Musa Tchelik, along with delivery of women together with Gunduz Akdeniz and Erkan Akdeniz, being the organized criminal group member, was also engaged in individual delivery of girls among the established contacts at high prices for the purposes of prostitution under the pretence of models provision, beside that,

According to the phone-tapping protocol regarding the phone call No.2, made on 18.02.2010 at 15:21 from the GSM phone with the number 531 681 38 37, owned by Musa Tchelik – from the talk content,

5316813837 (Musa Tchelik): I've already told you, a young and pleasant client

5322710057(Bekir): aha

5316813837 (Musa Tchelik): They want 2,000 dollars for two days as usual

5322710057(Bekir): ahaa

5316813837 (Musa Tchelik): I talked to one model, she said, "send me his photo, if I like him, I can go for less price";

According to the phone-tapping protocol regarding the phone call No.5, made on 18.02.2010 at 17:30 from the GSM phone with the number 531 681 38 37, owned by Musa Tchelik – from the talk content,

5316813837 (Musa Tchelik): you will see, by all means you'll like her, beautiful woman

5322710057 (Bekir): maybe I will, brother, but her air ticket costs 1,700 dollars... for her in... the worst or best 500 dollars.

5316813837 (Musa Tchelik): yes, right

5322710057 (Bekir): you understood? She will earn 2,200 dollars, I can't reasonably accept that, see? I would pay her some pocket money and would buy those tickets. This would cost me maximum 1,000 dollars, I thought about the event in Kazakhstan... I thought, we could do...

It has been established that Musa Tchelik delivered a woman to a man named Bekir Syddyk. A woman for the purpose of prostitution, as well as,

According to the phone-tapping protocol regarding the phone call No.204, made on 20.03.2010 at 12:54 from the GSM phone with the number 90531 681 38 37, owned by Musa Tchelik – from the talk content,

It has been established that Musa Tchelik during his talk with Svetlana, who supplied women from abroad, was negotiating about the status of juvenile victims, of their price and transfer, of the way how that system was working. In the course of the complex study of Musa Tchelik's negotiations with such people, it has been established that the crime had been committed on a constant basis, beside that, from the talk content,

902690996530 (Svetlana): but only she has to leave her family (a teenage girl for the client who will receive approval to leave or will leave home some other way)

905316813837 (Musa Tchelik): There's Galina, you know her? Your model Galina, who is also on my web-page

902690996530 (Svetlana): we can make it in one day if it is 1,000 (dollars). Then they'll ask 1,000 (dollars) for 1 day, which is normal, but 200 these 700 dollars is too little.

905316813837 (Musa Tchelik): I'll send you an SMS within 5 minutes, ok?

902690996530 (Svetlana): 1,000... well, be that as it may, 700 dollars only for one day...

From the specified above and subsequent negotiations it has been established that Musa Tchelik was delivering women for the purposes of prostitution, and with other persons, for the people who called them, he published on his Internet page www.mod.optimal.gmail the photographs, promised to deliver girls whose photographs would be chosen, he said that the girls were paid 1,500 – 3,000 dollars, that there were very and very beautiful girls, that he was paying the agent 1,500 dollars;

According to the phone-tapping protocol regarding the phone call No.98, made on 07.03.2010, during the talk with a man named Hussein, he informed him that such job could bring good money, asked to find a client – a football player, **that football players paid 5,000 dollars**, in case if he found a client for him, he might also earn some money, and he said to the man named Hussein, "**I mean, you find one client, for each one you will earn 500 dollars**," promised to satisfy the interests of intermediate parties if he was provided with clients. It has been established that the suspects of individual criminal action or the actions in the criminal group related to the delivery of women for the purposes of prostitution were of continuous nature.

It has been established that as a matter of fact the criminal group for the purpose of distribution abroad and inside the country on the Antalya market, got in touch with Hulya Erdogan aka Buse, engaged in the selling of women for the purposes of prostitution. For that purpose Musa Tchelik and Hulya Erdogan met each other and carried out negotiations on the matter which direction they should work in. Those negotiations were ensured by Gunduz Akdeniz. Finally, they made decision on the partnership consisting in the selling of the delivered women, although Hulya Erdogan aka Buse was working inside the country with the Turkish girls, beside that,

After the message sent to Hulya Erdogan on 17.04.2010 of the following content, "Hulya, the girl from Istanbul was sent to get a job, received 1,000 TL, 250 TL will be sent to Hulya, I gave the taxi driver account number, for the name of Khe@ISMET YILDAS to the Account No.119 in the

Yshyklar Azbank branch in Antaya. Let me know, please, as it is sent,” the next message was sent by the same person from the content of which it has been established whether the amount was approved;

It has been also established that the Turkish girls sent by Hulya Erdogan to the client for the purposes of prostitution sometimes faced problems and those problems were reported to Hulya Erdogan, beside that,

A prostitute writes in the SMS message sent on 18.03.2010 to Hulya Erdogan, “**ah, I was too nervous. Now I'm in my room. The previous job failed. With client we agreed for 150. He wants twice, I'm not a pipe, God, these people don't have money. Sister, I'm off**”;

From this message it is understood that the women sent by Hulya Erdogan for prostitution informed her of the clients requirements and of the amount of money paid to them, specifically, the message, sent to Hulya Erdogan on 10.03.2010 at 21:28, reads, “**two hundred for one time, he says**”, and the immediate reply message from Hulya reads, “**I leave it up to you, dear**”;

It has been also established from the subsequent messages that Hulya Erdogan from time to time was giving advices to the women, sending the following messages, “**you know it yourself, but I think you should not give discounts. He's able to pay any amount, say you want and he will give you 500**”, in reply to which a woman answered as follows, “**my life is 300 for two times, he says**”;

Having studied the SMS message No. 18 sent by Hulya Erdogan on 05.03.2010 at 20:40 from the GSM phone with the number 0539 865 92 97, owned by Hulya Erdogan, of the following content,

“**my dear, I have no spare, I have 2 new girls and they want 750 until morning**”

and a lot of similar messages and talks, it has been established that Hulya Erdogan's negotiations were related mainly to informing her of the problems suffered by the women, whom she sent for the purposes of prostitution, that Hulya Erdogan was selling those women, beside that

Questioned Songul Kuru stated in her evidence, “A woman known to me as Buse was sending me and my friends to VIP clients several times, and if requested, to our clients. It is true we had relations with them. It was she who received the money from the clients. She gave us our share later. I was doing that because of necessity. After that I cut off my relations with her. I haven't seen her for a long time. Beside that I changed my way of living. I don't have any claims for anything to anybody...”

Questioned Sevgi Uyanyk stated in her evidence, “Buse when it was necessary sent us to a number of her people, that's true... When we have met, she introduced me to her friends. Several times I've been in close relations with those people. I received the money myself... It's true, those people satisfied some of our needs. I don't know whether Buse was taking any money from those people she was sending us to. I was not made to do anything neither by Buse, nor by anybody else. I don't have any claims to anyone.”

Questioned witness Mustafa Atesh stated in his evidence, that three of his friends who worked in Germany visited Turkey for a short period of time to perform their active duties in Burdur. At first they went to Antalya and before leaving they decided to have swing, went to a disco at the Ufo Hotel in Antalya where they met a Georgian girl Natalya. Having informed Natalya of their wish to come into sexual relations with her, they took Natalya and two friends to their apartment and had sexual relations, paid the money, Natalya gave them her phone number and he gave his number to

Natalya. Natalya and his friends were approximately 30 years old. To the question if there were any young girls, Natalya said them at the Ufo hotel disco they would not find any 18-20 year old girls and gave them the phone number of a woman. Further to his evidence he stated,

"... I talked with that girl by phone. She introduced herself as Buse. I said Natalya had given me her number. At first we told her we wanted a dancer for our pleasure. She said she had one and asked us to give her the fixed phone number. I gave her the number of the hotel phone. I was called on that number by the woman known to be as Buse and described by you as Hulya Erdogan. She told me on the phone that they had dancers, that they could change if we wanted, said we could take them for east dances or for sexual relations at night. I said, ok... I asked 3 women for my friends. We got a deal on the price. The woman known to me as Buse told me, "on the phone we call those girls dancers further when calling us only with this request. Just order girls for a short program or for a long program on stage." I mean short-time sexual relations were called "the short program" and the sexual relations for the whole night were called "the long program". She said that we should order girls in that manner. I asked to send her three girls for that day. I asked whether the girls were beautiful. She told me they worked with big groups for the Mardan and Rixos hotels, and they had no bad girls. According to our agreement she should have sent the girls to us in two days. Before the girls arrived I called her. The woman known to me as Buse did not pick up the phone. On the day when she was to send the girls to us she called me back. She said on the phone, "I beg your pardon, I sent the girls to Bodrum. Big group is out there. They will perform a long program on stage, for about one week, I'm sorry, we'll compensate you later..."

They decided to find girls for sexual relations after the friends had left to perform their active duties, and according to Buse's words, as the girls had worked with big groups, they should have been good, thinking that she could provide beautiful Russian girls, they decided to hire the girls for sexual relations from her, and further to his evidence he stated,

"... We called the woman named Buse. She told us that new girls had just arrived and she had two of them. I asked her how we could see them. She said they could not come and show them to us as they worked only at night. She said she might send their photographs by phone or e-mail. She sent the photos of two women to my phone via MMS. We looked at those photographs and liked the girls. We said we wanted to take them. She told us they would cost 600. We understood it was in TL. On the day when we were to take the girls we asked whom we were to give the money – to the girls or to somebody else. She said we should give the money to the driver. I said, "Good, I shall give the driver 1,200 TL." She said no, they worked not in TL but in dollars. We calculated each girl would cost us 1,000 TL. We said it was too expensive. She told us they worked with big groups. The girls were good and high-class and said there would be no discount. I said I could not pay such money."

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“... Since we did not agree on the price, we could not do anything”, was said in the statement.

Being informed on the content of phone calls made between him and Julia Erdogan (Buse) on April 26, 2010 and other days, he answered the question regarding the negotiations: **“I talked to Buse specifically about using women for sex. I know this woman as a mediator in issues related to prostitution that is paid for selecting specific women”.**

Statements made by the suspected Polat Ozturk: Julia Erdogan (nickname Buse) together with a man called Akyn took part in events organized in hotels with a specific aim. They decided to cooperate (namely – send dancers to hotels and arrange music for “Turkish nights”). For that they opened an office in Lara, but Akyn changed his mind and refused to participate and told Polat: “Buse has also been involved in selling women, as she would find the girls and send them to earn money by doing specific things”. Akyn did not want to earn bad reputation and said he would not be able to work with Buse and that he would not participate in it.

However even after that Buse continued with orders for women sexual services, and for each woman arriving from Moscow she asked 1000-2000 US dollars.

The scripts of phone calls between him and Julia Erdogan (Buse) were read out to him and he explained that girls mentioned in those phone calls were intended for himself, and by this he confirmed that **Julia Erdogan (Buse) was in selling women for prostitution**.

It was found out that Julia Erdogan has also participated in prostitution affairs within the country as a mediator. She was assisted by Musa Chelik who would bring underage girls from abroad for prostitution and spoke about that over the phone several times.

The following information was also entered into the record:

The tap on Julia Erdogan’s mobile phone, 5398659227, recorded the following conversation (data entered into the record under N 28) on March 8, 2010 at 13:56:

5316813837 (Musa Chelik): ... there hasn’t been any news from them yet?

5398659227 (Julia Erdogan): ... from who?

5316813837 (Musa Chelik): From those little ones, who are 13 or 14.

5398659227 (Julia Erdogan): No, I have already told you the total agreement sum, 1250.

The tap on Julia Erdogan's mobile phone, 5398659227, recorded the following conversation (data entered into the record under N 45) on March 11, 2010 at 13:53:

5344776091: that is because he knows the market, he had many women sent to him

5398659227 (Julia Erdogan): Yes

5344776091: Besides he sells carpets, he already gets a lot cash

5398659227 (Julia Erdogan): Got it

5344776091: And he says he wants something "fresh", that will be cool

That confirms that Julia Erdogan was delivering underage girls and constantly communicated with people aware of prostitution market. The recorded conversation stating "he says he wants something "fresh", that will be cool" proves that she was specifically into selecting younger girls.

The scripts of the phone calls recorded with the help of the tap on Julia Erdogan mobile phone, 5398659227, on March 24, 2010 at 19:08 were entered into the record under N 69.

It becomes obvious that there was a trade channel organized, along which women who were said to be models were brought to become prostitutes. There were also other men involved in this organized trade.

Julia Erdogan had a phone call with a certain man who did not want to identify himself;

05305452191: there is no such necessity. We have the following requirements...

5398659227 (Julia Erdogan): Yes...

05305452191: They shall be young and very beautiful, they shall speak Turkish. If they don't match these criteria, we don't need them. One of my friends here says that they must be models, that's the most important.

05305452191: Let me ask you something. Do you remember 2 girls that I sent here?

5398659227 (Julia Erdogan): Yes, yes.

05305452191: Our boss took one of them for himself.

Following the investigation to identify and chase the suspected persons it was found out that underage girls were brought to Turkey to become prostitutes. At this Julia Erdogan used to specify her requests to certain persons who were connected to her as mediator.

In statements of Abu Bekir Syddyk Takina it is said that he worked in jewelry store Ilyadon in Riksos Premium Belek hotel, and he was employed by Fesikh Taminje. About a year and a half ago at hotel's disco party he saw 5 or 6 Russian girls together with Musa Chelik. Musa asked him what his job was, and he replied that he was into selling jewelry. Musa then said that he had a modeling agency and confirmed that he brought models to Turkey: "Then he explained what he was doing. He brought girls here for prostitution, and added that if more girls came he would send some to me. He gave me his phone number. I also gave him my phone number... Then I called him using his number. I wanted him to bring me a woman."

During the interrogation Abu Bekir Syddyk Takin was asked how Musa Chelik brought women in order to make prostitutes out of them and said the following: "Musa Chelik used to send me girls' photos over Internet. I looked at them. Was pointing out those that I liked and he was giving me their price, from 2000 to 2500 US dollars. Then I was making the final selection and he was confirming the deal. I asked Musa Chelik twice to confirm that he was sending me a prostitute. Musa Chelik is indeed in that business. Thus I became sure that Musa Chelik was into bringing prostitutes from abroad." Further on he continued: "Musa Chelik sent the photos of women I liked to my e-mail. He also sent those photos to Mr.Fesikh e-mail. But if Fesikh was at the meeting or did not pick up the phone, Musa Chelik called me. Girls' photos then were sent to me. Sometimes I had lots of such photos. It was not important that I would like them. More influential people connected to this structure should have agreed first. I have to repeat that I told Musa Chelik twice that I wanted a girl for myself. Once I paid Musa Chelik 2200 US dollars for a girl, and another time, when she was ordered for an orgy, I paid him 1700 US dollars."

There have been lots of phone calls recorded via taps that confirm mediating activities of Musa Chelik regarding great number of women. He sent women's photos to e-mails, discussed their age, their arrival cost, their stay duration. Also a certain person was mentioned who used to have a large group of women as a separate order. At this Musa Chelik was told that "goods shall be examined". In another phone call with Abu Bekir he said: "inform the boss, I sent one to him as well. You have her photo in mail". This was the answer to the question who he was mediating for.

Furthermore, he added the following: "All approved calls scripts are correct. It is true that I paid Musa Chelik and he sent me prostitutes. Those women were Russian, that is also true. According to what Musa told me, those were girls from Moscow modeling agency. Musa told me that was modeling agency was the channel he used for bringing women."

I confirm that I ordered a woman for Fesikh Taminje and was his direct mediator. I also confirm that I carried out several negotiations about that, but, as I stated earlier, only in cases when they could not talk directly. Then they would negotiate through me. I did not go to the airport to meet women who came to serve as prostitutes. Musa himself brought me women, and those women who had arrived for Fesikh Taminje were met by a driver, Vejsi Avji..."

This proves the fact that models that Musa Chelik ordered as prostitutes were brought to Turkey, which is confirmed by mentioned negotiations.

The tap for overhearing phone calls allowed recording a call between Musa Chelik and Abu Bekir Syddyk on February 18, 2010. The script was entered into the record under N 2.

Musa Chelik: Bekir, send me a photo.

Bekir: My photo?

Musa Chelik: Yes

Bekir: What happened?

Musa Chelik: I just talked to one agency

Bekir: And?

Musa Chelik: Told them I have a young and handsome client.

Bekir: And?

Musa Chelik: Usually they ask for 2000 US dollars per day

Bekir: And?

Musa Chelik: I talked to one model and she wanted to see your photo. Said if she likes you, she will give a discount.

Bekir: Wow!

Musa Chelik: Yes, see.

Bekir: Okay, I'll send it.

Musa Chelik: I laughed myself, but said you are young and handsome, they usually go to old ones.

Bekir: Shall I send a naked photo?

Musa Chelik: Come on, what for!

Bekir: Well, maybe that want to see the whole thing.

Musa Chelik: No, just with your face on the photo, send it to me, and I will send it to their mail.

Bekir: Okay, deal

Musa Chelik: Look, they are gorgeous!

Bekir: Okay, bro

It's becoming obvious that they spoke about women to use them as prostitutes, bring to Turkey and sell their sex services. While talking the suspects used the word "models", but in fact they talked about prostitutes.

Vejsi Avji gave the following statement: "I know Musa Chelik, the man you ask me about. However, I never met him personally. We only talked over the phone. I was given Musa Chelik's phone number by Abu Bekir Syddyk, who worked at Riksos Premium Belek. While with friends he once mentioned his name to me and said that the guy sells Russian women and gave me the number of Musa Chelik. After that I called the number that I was given by Abu Bekir. I told Musa that I was given his number by Abu Bekir and would like to order a woman for myself. After that first call he said he would call me back. I assume he wanted to get information about me. In 2-3 days he called back to specify what exactly I wanted. I said that I wanted to order a Russian woman. As far as I remember, when we talked first time he mentioned the price, it was 1500 US dollars for one woman. The woman came to Turkey from Russia. So I received my ordered prostitute. I gave money to Musa personally. After that we had some more negotiations of that kind, and I kept on ordering women through Musa".

It was founded out that the suspect Vejsi Avji not only held those negotiations for himself, but also acted as mediator. The script in the record shows phone negotiations with Musa Chelik on March 19, 2010, where Musa Chelik says the following: "Vejsi, look, I've talked recently to the boss. I know his taste. He likes mature ones, 25-28, and these are 16-18, he won't like them. If he wants I will send him a very beautiful one tomorrow."

That phone negotiation of March 19, 2010 was about 25 year old Sofia, citizen of Russia. Being asked how they could see the girls personally, Musa Chelik said he could send their photos by e-mail, then he could look through them, choose and say which he liked. Musa Chelik sometimes held negotiations with women, and usually they discussed girls' height, age, eyes and hair color, citizenship, agreed on price for girls to come and how to meet them and where to take, who would take them. Sometimes those were negotiations about several girls at a time. For example, on March 20, 2010 Musa Chelik was negotiating looking at the photos and saying: "There is one, called Natalia, she's 18, Valentina is 19, Galina, 1,74 height, Anastasia 1,75 height, both 19 year old, Elena is 20, Marina is 1,74 cm, Nastya 16 year old, Sofia 25 year old." After all personal characteristics and names of girls were discussed, Musa Chelik said: "25 year old Sofia can come to the boss." Vejsi confirmed that, and Musa added: "There can be one more before her, Alyona". When asked if he was a mediator for another person, he answered:

"All those negotiations took place. I visited website of Musa Chelik, chose women there. I would write down names and personal characteristics of girls. Then I would tell that to Musa Chelik. The Musa would start searching. If it was possible, he negotiated with them on their arrival. It never happened that anyone could always come. Prices for girls would change from 700 to 1500 US dollars. That was the price for one day, precisely for one night. Depending on how long she would stay, the price multiplied by the number of those days... The mentioned boss was Fesikh Taminje. He is my friend. From time to time he also talked to Musa about women. When Musa could not reach him on the phone, he talked through me. And I sent those orders to him. The girls were brought to Fesikh Taminje..."

"I ordered a prostitute through Musa Chelik 4-5 times. As far as I remember, two times I ordered Russian women for myself, and each time I paid 700 US dollars. Minimum three times Musa Chelik brought Russian women for Fesikh.

Musa Chelik pretended he cooperated with modeling agency, but instead he brought prostitutes from Russia. As far as I know this is how he acts." It was confirmed that Musa Chelik continuously used recommendations of Teufik Arif and often brought him women for sex services.

While interrogating Fesikh Taminje, he confirmed that Abu Bekir Syddyk worked in a jewelry store Ilyadon and told him several times that using Musa Chelik's services he could bring women from Russia for prostitution, and that photos of girls could be seen in Internet. He also stated that he never met Musa Chelik personally. Once he ordered a woman named Sofia, but the girl could not come because of her schedule. He also said that once he took a woman to Antalia for himself, but then he found out that it was not the girl he had chosen before by photo, he did not like her and he sent her back.

"Everyone knows that. Musa Chelik's business is bringing models who become prostitutes in Turkey. As far as I know, Abu Bekir was well aware of that..." He continued his testimony saying that the scripts of all his phone calls were correct, and confirmed that he was given girls' names via Internet. He said he looked through photos and chose women he liked, identified them with numbers they were given, negotiated the price for those women including transfer and air flight that was 1500 US dollars, but added at the end that the girl he had ordered did not come.

ORGANIZED CRIMINAL GROUP AT RENTED YACHT SAVARONA.

It was confirmed that the criminal group brought women not only to Antalia, but to Bodrum as well in order to get them involved in prostitution business.

The tapped phone calls of criminal group members confirmed that the suspects regularly stayed in the hotel Bodrum Riksos, and during the last five years at least twice a year they rented a yacht Savarona. Rental was made by Gunduz Akdeniz on behalf of Teufik Arif and Alexander Mashkevich.

The tap on Teufik Arif's mobile phone, 0530692428, recorded the following conversation (data entered into the record under N 7) on May 25, 2010 at 15:58:

Gunduz Akdeniz: I just talked to mister Kakhraman.

Teufik Arif: Yes, yes.

Gunduz Akdeniz: He says there is no place to stay in Izmir, we can only stay in a place near the fountain, it's called "Alachaty".

Teufik Arif: ... Moscovite wants Savarona. When exactly in September?

Gunduz Akdeniz: Okay

Teufik Arif: You talk to him straight away and ask when he wants it, and do it this way.

Thus, Gunduz Akdeniz agreed on the rent of Savarona with its owner, Kakhraman Sadykogly.

While overhearing the phone calls it was founded out that Savarona was rented twice. First agreement was concluded with "GEMI KURTARMA DENIZJILIK VE TOURISM A.S." JSC on June 7, 2010 on the rent of the yacht till June 11, 2010 with payment of 194,067.79 US dollars + VAT (18%). The person to rent the yacht was GUNDUZ AKDENIZ.

~~Second agreement in 2010 on the yacht rent was concluded on September 25, 2010 and was valid till October 3, 2010. The person who concluded the agreement was Gunduz Akdenis (Alexander Mashkevich), and the rent amounted to 300,900.00 US dollars + VAT (18%).~~

~~In the statements, obtained from Kahraman Sadikoglu, it has been evidenced that the vessel was rented in June in the name of Tevfik Arif through intermediary of Gündüz Akdeniz; rental payment was also made by Tevfik Arif. Then another leasing contract was made through intermediary of Gündüz Akdeniz. It presupposed Aleksander Mashkeyitch as a tenant, and rental payment was made by Mashkevitch himself.~~

He answered a leading question on how the rental charge for the Kahraman Sadikoglu's yacht had been appraised: 'The Savarona rental charge depends on the terms of lease. Net rent price of the yacht with the crew varies from \$35,000 to \$50,000. But, as I mentioned before, all expenses, including beverage foods and meals required, are added to the rent price, which is usually fixed in the agreement of affreightment'. This statement has been entered into the examination record.

In the course of tapping of means of communication it has been established that from June 6, 2010 to June 10, 2010 women, arrived from Russia, were sent to Bodrum as well as that some of them were sent to the Savarona yacht.

After the fact that on June 10, 2010 the suspects conveyed women to Bodrum for the purpose of prostitution had been established, on the basis of transcript of talks recording, made by technical watch facilities, it has been recorded that in the airport there was a transport vehicle of the make Renault Megane with the registration number 34 AH 2847 and that a Russian citizen Kamilla Abbasova (1992 year of birth, passport No. 07 0367639) got into it. The identity of the driver of the transport vehicle has also been determined. He turned out to be Dzhamil Tokaly, who on June 11, 2010 at 09.35 in the morning took women to the Savarona and, according to wiretapping records, it has been established that the women were supposed to be deported back to their native countries at 09.35 in the morning.

On the basis of wiretapping it has been established that on June 11, 2010 the transport vehicle with the registration number 34 AH 2847, driven by Dzhamil Tokaly, was examined. Along with the identity of Tokaly, identities of a Russian citizen Diana Dzhiganshina (July 13, 1991 year of birth, passport No. 70 2565615) and a Moldavian citizen Alisa Gorbacheva (passport No. A 2060792) has been determined, which has also been recorded by watch facilities. By means of watch facilities it has also been established that after the order had been given at 15.45 to send some of the women back to their native countries, the women were carried to the airport by means of the transport vehicle Mercedes Vito with the registration number 34 TT 3046, and at the moment of examination by the Road Control Service the women who were in the said automobile were identified: Russian citizen Anna Kiseleva (September 30, 1991 year of birth, passport No. 63 5823186), Russian citizen Anna Nikitina (March 31, 1992 year of birth, passport No. 63 6231375), Russian citizen Valentina Kleshcheva (July 10, 1991 year of birth, passport No. 63 4613070). Copies of passports of the above mentioned women have been made.

From July 6, 2010 to July 11, 2010 Gündüz Akdeniz, Eldar Bayiogluev, Erkan Aknediz and Musa Chelik were holding negotiations, resulted in that women had been carried to the Savarona as prostitutes. The

majority of women had been delivered by efforts of a criminal group, and Anna Nikitina arrived the last. She was picked up from the airport by Eldar Bayiogluev. Most part of the negotiations on the transfer of these women has been recorded, and through intermediary of Musa Chelik some of telephone talks have been protocolled under the numbers **номерами** 445, 447 448, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 481, 482, 483. It has also been established that some of the women had been transferred through intermediary of a certain person named **Igor**.

Numerous women, who were planned to engage in prostitution by efforts of the criminal group, were mentioned in these talks.

Talks between Musa Chelik and Gündüz Akdeniz on June 8, 2010 have been protocolled under the number 480; Musa Chelik asked Gündüz Akdeniz if there were any problems with women. Gündüz Akdeniz confirmed that there were no problems and women were all right. Then Musa asked: 'What about ours?' and Gündüz Akdeniz answered: 'Both theirs and ours are OK'.

Musa Chelik: Did Boss said anything about it?

Gündüz Akdeniz: No, he didn't. He just said in the evening to separate the best of the fresh ones from agencies.

Musa Chelik: And?

Gündüz Akdeniz: We did. But he wants that one again.

Musa Chelik: Yes, yes

Gündüz Akdeniz: Well and good. **Moskovitch** takes ours for himself and will make better money.

Musa Chelik: Yea, moreover, you know what I said to him? You know Olesya?

Gündüz Akdeniz: Yes

Musa Chelik: I said they would pay in cash

Gündüz Akdeniz: They will

Musa Chelik: Everything has turned out well, I hadn't even have to lie

Thus, the above mentioned talks confirm that the Savarona was planned to house many businessmen and women, provided by the criminal group. A certain person named **Igor** also took part in that, transferring women in the name of **Moskovitch**; besides women arrived in the name of Tevfik Arif also due to the efforts of the criminal group.

It may be said with certainty that it could be possible to take suspected members of the criminal group unawares in Antalya, their place of action, which is confirmed by the recorded talks of the Savarona rent.

By the number of the cellular telephone, belonging to Erkan Akdeniz, 05338150066 on September 24, 2010 at 19.41 (under number 3) there have been registered bug records of telephone talks with Gündüz Akdeniz, whose telephone number was 05322139771, and a sent SMS:

'Pertseva Albina, Batyaikina Ludmila, Korovina Ekaterina, can't get Eldar'.

So, this SMS proves that women were supposed to arrive from Russia for the purpose of prostitution, on September 25, 2010 they were supposed to come from Russia to Istanbul, and then transferred to Bodrum.

On September 25, 2010 at 12.30 women arrived to the Bodrum airport where they were met by responsible persons. It has been recorded that there arrived 9 foreign citizens, and only 3 of them provided their passport data; in Bodrum they were provided with accommodation in the Rixos Hotel.

It has been established on September 26, 2010 that Tevfik Arif did not like Ekaterina Korovina, provided to him for rendering sexual services, after which she had been sent back. All members of the criminal group have been arrested. To obtain necessary evidence it has been decided to send everybody to the Savarona for searching. During the raid the following people have been detained aboard the Savarona yacht:

Albina Pertseva, who arrived to Turkey with the help of Eldar Akdeniz for the purpose of prostitution, Ludmila Batayikina, arrested together with all the suspects, Aleksandra Tarasik, Ilona Kudentsova, Kseniya Gladkova, Kristina Kolesnitsova, Valeriya Pristupa, Liliya Bobrovska, and Kristina Zhukova. On September 17, 2010 at 15.42 Gündüz Akdeniz and Erkan Akdeniz were talking on the telephone, which has been recorded by a telephone bug. This telephone talk proves that from September 25 to October 3, 2010 criminals were planning to organize an event aimed at bringing women from Russia for the purpose of prostitution, and the total number of women was 22.

Telephone talks have been recorded:

The detainees confirmed women who were supposed to arrive from abroad, rented a yacht for the period from June 4 to June 10, 2010 where they brought selected women, and on September 25, 2010 they rented the Savarona yacht where they brought more women for the purpose of prostitution.

Some of women, brought from June 4 to June 10, 2010, were planned to send back on June 9, 2010. It has been recorded at the moorage that women were disembarking the yacht and their baggage was being unshipped. The same records show Eldar Bayiogluev and Gündüz Akdeniz helping women to disembark. On June 9, 2010 Tevfik Arif stayed aboard together with other businessmen, who then arrived to the Bodrum marina; the same day a camera has recorded Tevfik Arif drinking tea with women in the Bodrum marina.

From September 25 to October 3, 2010 the Savarona yacht was planned to house an event during which Erkan Akdeniz by means of a Russian modal agency confirmed and brought female prostitutes to Turkey. Among them there were Albina Pertseva, who arrived to Turkey on September 25, 2010, Ludmila Batyaikina and Ekaterina Korovina; all in all 9 women have been recorded by a surveillance camera.

These women were carried to the Rixos Bodrum Hotel by a minibus and an automobile with the registration number 34 TT 5956.

SEPTEMBER 28, 2010, SEARCH ABOARD THE SAVARONA YACHT DURING THE RAID ORGANIZED ON SEPTEMBER 28, 2010

In cabins, where the suspects and victims were detained, there have been found numerous condoms, oral contraceptives, portfolio with photographs, prepared by Kristina Zhukova for her client, hotel bills of foreign women for expired periods, including reservations and details of hotel invoices. During the search, the results whereof has been protocolled, the people aboard have been identified: besides

Gündüz Akdeniz and Eldar Bayiogluev, there were businessmen Tevfik Arif, Aleksander Mashkevitch, Patokh Shoduyev, Musa Bazhayev, Arbi Gairabekov, Alijan Ibragimov. Besides them there were 7 security people, 2 masseurs, and 2 women who had no relation to prostitution.

The following women have been detained aboard the Savarona yacht: Kristina Zhukova (November 26, 1989), Ilona Kudinova (September 10, 1990), Ludmila Batyaikina (February 16, 1992), Kristina Kolesnikova (December 26, 1988), Kseniya Gladkova (February 29, 1992), Albina Pertseva (August 25, 1992), Aleksandra Tarasik (August 10, 1989), Valeriya Pristupa (August 31, 1988), and Liliya Bobrovska (August 7, 1987). They have been carried to Antalya, but refused to testify and sign protocols.

Thus, in the course of the investigation concerning actions of 9 women, engaged in prostitution, who has been carried to Antalya, it has been established that two of them, playing the leading roles, told to others not to bear any witness or sign anything and threatened those who wanted to testify.

It has been proposed to hold negotiations with the Russian Consulate to make women feel safe; women have also been proposed a Russian-speaking barrister from the college of advocates, they have been giving right to contact their relatives, but women refused all this. Later some women said that they were going only to the Savarona, but they were governed by Ilona Kudentsova, who had been arrested and accused by another reason. The 10th Criminal Court of Antalya possesses information, according to which on September 30, 2010 at 16.42 Ilona sent SMS of the following content: ‘don’t bear any witness. None of you’ from the cellular telephone NOKIA 6700C-1: +79653327287. This fact has been protocollled under the number 2010/346 as of October 1, 2010.

Then again, on September 30, 2010 another SMS was sent from the number +79653327287: ‘everything is falling, keep silent, sign nothing, they are beyond control and have no power, you’ll come back home soon’.

Further on, on October 1, 2010 at 02.02 an SMS was sent from the number +79163456634: ‘Ilona, you don’t know these men, don’t worry, you just turned out to be at a wrong time at a wrong place, keep the girls silent as a grave, tell nothing to the consul’. Everybody followed the instructions.

In fact, none of the women, carried to Turkey for the purpose of prostitution, has ever been assaulted by the criminal group, but during the conducted operation women were forced to keep silent, not to bear witness and not to sign anything, which is proved by SMS sent by Ilona to all women.

During the investigation, carried out by the Republican Procuration, it has become evident that women are going to follow the instructions and will not give testimony on the case. They were forbidden to talk about their place of employment in Russia, or about a certain model agency, all of them were forced to keep silent. During examination of the legal claim, it has been established that the suspects exerted a direct influence on women; however they have not lodged any complaint against the criminal group.

EXCERPTS FROM STATEMENTS OF SUSPECTED MEMBERS OF THE CRIMINAL GROUP

Evidence given by Tevfik Arif: in general Arif is not agreed with accusations; he obtained a Turkey passport in 1994; he said that earlier he created the Labada Hotel and then introduced it into the structure of Rixos Hotels. He also stated: ‘In general, I contributed to financial support of the Rixos Group. I brought my partners from the Republic of Turkey. I have never had any efficient partnership

in those hotels. But I'm still connected with Rixos Hotels. But these are some legal aspects and a separate topic for discussion'. When interviewed concerning his role in transference of women, most of whom were minor, for the purpose of prostitution together with Musa Chelik and Erkan Akdeniz through the modal agencies, he said:

'I spend my spare time with other businessmen...The rule is that businessmen take their beloved to such meetings. And I ensure transfer for them. And that is all. Two or three months ago I rented that yacht. Together with other businessmen from Russia and other countries we negotiated about investments. We were having rest. All negotiations concerning the Savarona were held by Gündüz and Kahraman Sadikoglu.

All women who arrived to the Savarona were invited as guests of those businessmen. These were them who invited those women for the first and second meetings. I didn't bring anyone. We only transferred those women. As they don't know Turkey, we help models to travel around the country. We take them from the airport and drive to hotels or to the yacht'.

According to the record, made with telephone bugs, on demand of Gündüz Akdeniz, Musa Chelik negotiated with Erkan Akdeniz a transfer of models from Russia for the party that was supposed to take place from March 15 to March 21, 2010 in Antalya.

It has been established that certain women were picked out according to requirements of Tevfik Arif, and on the basis of the video record, obtained by the Criminal Court, it has been established that on March 15, 2010 at 19.23 the selected women arrived from Russia to the Antalya airport, as it had been agreed upon with Musa Chelik. Women were met by Kemal Tokay and then accommodated in the Belek Rixos Premium Hotel.

So, it has been established that Kemal Tokay met foreign women in the airport. To identify those women, the traffic gendarmerie stopped the vehicle near the city of Belek at 20.00 on March 15. Among people who were in the vehicle, there were: underage citizen of Russia Vasilisa Savatayeva (1994), underage citizen of Germany Stefania Ruschikova (1994), underage citizen of Russia Kseniya Zakharova (1993), citizen of Russia Olesya Moskalets (1992), citizen of Russia Veronika Danilina (1991). It has been duly protocolled; besides, on the basis of records made with hotel surveillance cameras, it has been established that young women were not registered in the hotel. Concerning this fact, Tevfik Arif said:

'I didn't see them. I don't remember them'.

According to testimonies of Gündüz Akdeniz, Musa Chelik, Eldar Bayiogluev, Kemal Tokay, Erkan Akdeniz, those young women had obviously arrived to Antalya, and then they had been accommodated in the Rixos Hotel by order of Tevfik Arif. In connection with the fact that young women had been accommodated in the Belek Rixos Premium Hotel, the suspected Tevfik Arif was reminded of the fact that young women were recorded with surveillance cameras in hotel gyms and on different floors of the hotel. This is how he commented upon this statement:

'I won't agree with this. I've never seen these young girls'.

When acquainted with the printout of numerous telephone talks between Gündüz Akdeniz and Eldar Bayiogluev, he also said that he would not accept such statements and that by the word 'contract' he meant 'agreement'. Arif denies imputation of intermediation in prostitution and human trafficking and does not admit his guilt. Besides, during judicial examination he said that he had invested in Turkey \$15 billion and promoted investments from foreign citizens. He also said that the raid, conducted aboard Savarona, and his

arrest are not justified by the fact that the police found come condoms and some guys, having fun with women in Jacuzzi after the party, because he has no relation to these events.

TESTIMONY OBTAINED FROM THE SUSPECT GYUNDYZ AKDENIZ

He has worked with Tevfik Arif for a long time and has been his driver and assistant. Tevfik Arif has been his boss for 17 years. He retired in 2004 and is living in Tevfik Arif's house in Istanbul.

At Tevfik Arif's request, he brought many women from abroad and using Musa Chelik and Erkan Akdeniz he brought the girls, both younger and older than 18, intending to use them in prostitution. He was asked a question in connection with this, to which he answered as follows:

"During the meetings, Tevfik Arif usually calls on the phone. He might tell me that he is arriving on the fifth. Then I get a hotel ready for him. I reserve seats in restaurants. If he wanted to rent a yacht, I did it. He also comes here to meet with businessmen about investments. They come with guests, models. Since they don't speak Turkish, I arrange their transportation. Sometimes fashion model guests also come to see Mr. Tevfik and he might ask us to arrange for some models. We also invite them. I take care of any associated air transportation and transportation. Typically Eldar Baygouev did this, as well. I just took care of transportation." He also stated the following:

"I call Musa Chelik regarding the modeling agency. Musa Chelik uses his connections to supply models from Russia. If I can't get a hold of Musa, I call Erkan Akdeniz to tell him to bring models. Then he calls the modeling agency, gets their pictures and sends them to me. I look at them. From the pictures, I pick women based on the requests and what's going on that day, and I pass on the information about them. They, in turn, tell the agency. Afterwards, Eldar Baygouev handles everything. Eldar makes the decisions about tickets and reservations. If the girls have arrived in Antalya, I call Kemal Tokay. I ask him to bring them to the hotel. Usually we take them to the Riksos Premium hotel. If they're thinking about Bodrum, then the Riksos hotel there has their own network of rental cars. There's a man there by the name of Semikh. I get in touch with him. We give him the information about the incoming flight. We collect the guests or girls at the airport and take them to the hotel."

In addition, he was asked about Tevfik Arif's requests of Gyundyuz Akdeniz.

Gyundyuz Akdeniz brought minors and adult women to Turkey several times at the instruction and request of Tevfik Arif. Information obtained from what we heard and from the video surveillance shows that the women they didn't like were sent back and this was entered into the record. To the question "What was the purpose of bringing the women?" he answered as follows:

"We invited these girls for companionship at lunch, dinner, and on walks. Mr. Tevfik and his friends very often would show up accompanied by women. Mr. Tevfik constantly held meetings with businessmen about investments. He would bring beautiful women and seat them at the table to decorate it, like flowers. His own girls usually sat next to him.

I do not show pictures of the girls to Tevfik Arif very often. I choose them myself. If the girls aren't pretty enough for us, we send them back. Whenever we sent girls back, it was always because they weren't pretty enough. Some of the girls themselves would say that this wasn't the right situation for them and they were leaving."

The following facts were established as the testimony continued: Requests to recruit new girls were sent to the agency that chooses the models, but it was not clear if these girls were adults. Tevfik Arif ordered the girls. The Savarona yacht was rented at Tevfik Arif's request. Once the Savarona yacht was rented in Tevfik Arif's name and once in Aleksandr Mashkevich's. They supplied some of the women personally. It was also established that Erkan Akdeniz chose Albina Pertseva, Lyudmila Batyaikina, and Ekaterina Karoniva on Sept. 25, 2010 and they were delivered to the Savarona yacht.

The women who were chosen by Musa Chelik and Erkan Akdeniz should have been sent to the Belek Riksos Premium Hotel on March 15, 2010 and to do this, Kemal Tokay was given instructions to meet them at the Antalya airport and deliver them to the hotel.

After getting confirmation that Tevfik Arif had ordered women from Russia and they had arrived in Antalya, it became evident from the video surveillance recording that had been obtained that the women arrived at the Antalya airport on March 15, 2010 at 7:23 pm, at Musa Chelik's request. They were met at the airport by Kemal Tokay and he took them to the Belek Riksos Premium Hotel.

So, it was established that Kemal Tokay met the foreign women at the airport. In order to verify their identity, their car was stopped by the traffic gendarmerie near the city of Belek at 8:00 pm on March 15, 2010. Among the people in the car were: Vasilisa Savateeva, an underage Russian citizen, born 1994; Stefaniya Ruschikova, an underage German citizen, born 1994; Kseniya Zakharova, an underage Russian citizen, born 1993; Olesa Moskalets, a Russian citizen, born 1992, and Veronika Danilina, a Russian citizen, born 1991. All of this was entered into the record of the investigation. In addition, information was obtained from the video surveillance camera at the hotel and it was established that the girls were also not registered at the hotel itself. He was asked about this, and this is the answer he gave, "I don't specify that the girls have to be 16. I just provide women or models. You'd think a 16-year-old girl could come here as a model without her parents' permission. Since I didn't know about the hazards of getting them here, I didn't have anything to do with it. I didn't know whether underage girls came to us. I just look at the photographs and pick them. That day I didn't know who arrived."

.It was established that eight rooms were reserved at the Riksos Premium from March 15-21, 2010. However, there is no information about the women's arrival in the hotel's guest registration book. The suspect, who had not yet used his right to remain silent, when asked why the underage girls weren't registered at the hotel, decided to use his right to remain silent.

He familiarized himself with the recordings of the conversations about supplying underage girls and confirmed that he participated in this, he knew about Musa Chelik's and Erkan Akdeniz's connection with the modeling agency, he knew that the girls chosen from the photographs were sent to Turkey, and he had even heard that some of the girls were minors. On March 15, 2010, underage girls arrived at the Antalya airport. Their identities were verified by the gendarmerie at a roadside stop, and then information was requested about their hotel registration. Then it became clear that there might be problems because the girls were not 18. He told Tevfik Arif about this and after that incident they did not bring in any more girls under 18.

Recordings of telephone conversations made from a listening device were documented and entered into the record. These recordings were made on Erkan Akdeniz's mobile telephone number on March 29, 2010 at 3:08 pm (under number 9).

Gyundyuz Akdeniz: he doesn't want these 16-year-olds – he says they're too young, there'll be problems

Erkan Akdeniz: there are 19-year-olds

Gyundyuz Akdeniz: send me pictures of the ones who can come tomorrow

Erkan Akdeniz: OK, three are ready

Gyundyuz Akdeniz: then talk to them and tell me who can come

Erkan Akdeniz: the 16-year-olds went to Miami earlier, as far as I know, but OK, it doesn't matter, I'm not going to mix anything up

Gyundyuz Akdeniz: no, he doesn't want them, he says we can't. Ask if there are any 18- or 19-year-olds, if they can come tomorrow, if you can get the plane tickets

Erkan Akdeniz: they're ready, they're ready, everything's ready, I'll send you their three photographs by tonight

As to the question about Tevfik Arif earlier negotiating about waiting to invite the 16-year-old girls, he answered that the information from the conversations was true and he confirmed that his boss (Tevfik Arif) did not want to do business with minors and in the continuation of his testimony he claimed:

"I don't agree with the accusation of having created a criminal gang or that we brought women here as prostitutes. I carried out the orders I received from the man I worked for. I don't have the right to raise objections with my boss. And he didn't tell me he wanted prostitutes. He only spoke about having women and models present at his meetings. I didn't make any profit or do any business deals out of this." It appeared so from his statements, but the record in which all the conversations were entered, the recordings from the surveillance cameras, and the bank statement all show that he received \$2,500 from Tevfik Arif for each woman that was brought in. From this amount he paid the agency \$600 and the girls got \$600 a day. After deducting the expenses for air travel and transportation, each person got \$1,000 and it was shown that this money was subsequently divided between Erkan Akdeniz, Musa Chelik, and Eldar Baygouev.

TESTIMONY GIVEN BY ERKAN AKDENIZ

He said that he previously worked for Tevfik Arif, that he was Gyundyuz Akdeniz's uncle and that during the time he worked with Gyundyuz Akdeniz he was an intermediary in the dealings with the modeling agency and he took part in delivering girls to Turkey. He said that these agencies are located in Moscow, that they were VIP modeling agencies, that the agency emailed him photographs of the girls, that the girls' names were used in telephone conversations in order to invite them as guests, and for the contract, and then eventually the pictures of the girls were sent to Eldar Baygouev, Tevfik Arif's assistant, and Eldar arranged the girls' transportation – he met them at the airport and took them to the hotel. He also sent money to the girls' account.

On Sept. 24, 2010 at 7:43 pm, the suspect Erkan Adkeniz sent a text message, the contents of which were entered into the record under number 3:

CONTENTS OF THE TEXT MESSAGE: "Albina Pertseva, Lyudmila Batyaikina, and Ekaterina Koroniva. I can't reach Eldar on the phone." He was questioned about this and he answered as follows:

"I ordered these girls from the VIP modeling agency and Eldar bought their tickets. Eldar told me he bought the tickets and emailed them to me. I emailed these tickets to the modeling agency. The girls arrived in Bodrum on these tickets. And I don't know where they went after they got to Bodrum. I don't know if they went to the Savarona or not."

.After getting confirmation that Tevfik Arif had ordered women from Russia and they had arrived in Antalya, it was documented, based on the video surveillance recording that had been obtained, that the women arrived at the Antalya airport on March 15, 2010 at 7:23 pm, at Musa Chelik's request. They were met at the airport by Kemal Tokay and he took them to the Belek Riksos Premium Hotel.

So, it was established that Kemal Tokay met the foreign women at the airport. In order to verify their identity, their car was stopped by the traffic gendarmerie near the city of Belek at 8:00 pm on March 15, 2010. Among the people in the car were: Vasilisa Savateeva, an underage Russian citizen, born 1994; Stefaniya Ruschikova, an underage German citizen, born 1994; Kseniya Zakharova, an underage Russian citizen, born 1993; Olesa Moskalets, a Russian citizen, born 1992, and Veronika Danilina, a Russian citizen, born 1991. All of this was entered into the record of the investigation. In addition, information was obtained from the video surveillance camera at the hotel and it was established that the girls were also not registered at the hotel itself. He was asked about this and he answered as follows:

Two photos of these girls were received in advance. Possibly one was Olesa Moskalets – all the photographs were on the computer. Possibly he emailed these photos to Gyundyuz Akdeniz. He said possibly he acted as an intermediary to provide girls, and he also said that possibly Musa Chelik was also an intermediary in these matter.

Recordings of telephone conversations made from a listening device were documented and entered into the record. These recordings were made on Erkan Akdeniz's mobile telephone number on March 29, 2010 at 3:08 pm (under number 9).

Gyundyuz Akdeniz: he doesn't want these 16-year-olds – he says they're too young, there'll be problems

Erkan Akdeniz: there are 19-year-olds

Gyundyuz Akdeniz: send me pictures of the ones who can come tomorrow

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Erkan Akdeniz: the 16-year-olds went to Miami earlier, as far as I know, but OK, it doesn't matter, I'm not going to mix anything up

Gyundyuz Akdeniz: no, he doesn't want them, he says we can't. Ask if there are any 18- or 19-year-olds, if they can come tomorrow, if you can get the plane tickets

Erkan Akdeniz: they're ready, they're ready, everything's ready, I'll send you their three photographs by tonight

As to the question about the underage girls who were invited earlier, but the girls invited on March 15, 2010 were not registered in the hotels guest registration book and in order to avoid problems like this in the future, he refused to accept such young girls. To the question about the circumstances, he answered as follows:

"All these girls are models. They can work with their parents' permission, if they are over 15. Mr. Gyundyuz came to me with a request. I negotiated with the agency. And as a result, three girls were confirmed. And I found them. I don't offer anyone 16-year-old girls. The agency suggested that to me. And then I communicated their offer to them. Other than the girls mentioned above, no one else was brought in during September. It's more accurate to say that I just send photographs of the models. I don't have anything to do with their arrival and departure. I didn't receive any money associated with the last three girls. Eldar always sends money to my account. Eldar was also among those detained. The agency did not receive money for these girls."

It was established that on March 15, 16, and 17, he, along with Musa Chelik, brought the adult and underage girls to Antalya, and along with Kemal Tokay, collected the girls from the Antalya airport and sent them to the Riksos Premium hotel. The recordings from the video surveillance camera were entered into the record. They show how the girls went into the hotel, appeared at the reception desk, left their hotel room, and exercised in the hotel's gymnasium. Later it became clear that the girls were not registered in the hotel, that the registration had been made in the name of Gyundyuz Akdeniz, and thus it was concealed that there were underage girls in the hotel. Recordings of negotiations were obtained that confirmed that the girls had definitely been supplied as prostitutes. The suspect had a specific role in how the girls arrived in Turkey and he was involved in human trafficking and acting as an intermediary for prostitution. However, the suspect is not admitting his guilt on these charges.

TESTIMONY OBTAINED FROM MUSA CHELIK

During the questioning about adult and underage girls being ordered from a modeling agency and brought to Turkey from Russia for the purposes of prostitution at the request of Tevrik Arif and at the instruction of Gyundyuz Akdeniz and Erkan Akdeniz, Musa Chelik was asked, "What was the purpose of bringing the women?"

He answered as follows, "Tevrik Arif is considered to be a pretty major businessman in Turkey. He comes to Turkey for business meetings every 2-3 months, sometimes once a month. He conducts these

activities along with foreign businessmen. During these meetings, he asks me to find him some women. I establish contacts with Russian agencies in order to do this, and I try to find suitable models for them. Besides my own contacts I've established, I sometimes also find girls on my own on the Internet. I go to websites and look for suitable models and correspond with them. I ask if they want to earn some money. If she confirms that she wants to work, then I have this kind of conversation about the work. First of all, they ask about how much they'll get. There's a standard price for this women - \$500 a day. All the expenses (the hotel, travel, accommodation, etc.) are calculated separately. Some girls won't agree to come for that price. They ask for \$1,000 to \$5,000. After that, we send the girls' photographs and preferences to our clients. If the client agrees, we set up a way for them to contact each other and we determine the dates when they should arrive. After we get confirmation of their arrival, I tell Gyundyuz Akdeniz and Eldar Baygouev. As a result, if they like the girl, they put in an order for her to come. They organize their air travel and all the associated expenses. When the girls arrive in Turkey, like I said earlier, certain people meet them at the airport and bring them to the hotel. Usually we send the recent arrivals to the Riksos Premium hotel in the city of Belek."

And in continuation of this testimony: "When they ordered girls from us, they always talked about models, just models. If they were ordering a prostitute, then that's what they would have called her. Never did Tevrik Arif or his colleagues ever indicate that prostitutes were what they needed. They always said that they needed models. I can't make conjectures about what they did with the girls who arrived since I didn't see anything personally with my own eyes. I can't say anything about that."

Recordings of telephone conversations made from a listening device were documented and entered into the record. These recordings were made on Musa Chelik's mobile telephone number, 5316813837, on Feb. 18, 2010 at 3:21 pm (under number 2).

5316813837 (Musa Chelik): I said that the client was young and good-looking.

5322710057 (Bekir): and what?

5316813837 (Musa Chelik): they usually want \$2,000 for two days

5322710057 (Bekir): and?

5316813837 (Musa Chelik) I talked to the model and she is asking me to send her your picture. She says if she likes him she'll come for less money.

The girl agreed to Musa Chelik's high price. Musa Chelik was reminded of all of this during the interrogation, to which he answered, "I don't want to testify about that."

It was established that the suspect, Ebu Bekir Syddyk Tekinu, ordered women for the purposes of prostitution and that Musa Chelik was the person who arranged for these women to be delivered. The sum of \$1,700 was once received from this person and once \$2,200. Women were ordered for the purposes of prostitution a total of two times and Musa Chelik and Fesikh Tamindzhe had more than one telephone conversation on this subject. He was asked about the recordings of the negotiations that were listened to and entered into the record concerning bringing in underage girls for the purposes of prostitution and where Musa Chelik acted as an intermediary and he answered as follows:

"In March of 2010 I brought in very young girls. They were about 16 or 17. I brought them in at Tevfik Arif's request. To be precise, Gyundyuz Akdeniz phoned me with that request. Sometimes I talked to Eldar about that. But typically the person I negotiated with about that was Gyundyuz Akdeniz. I was the one who brought in the girls who arrived on March 15, 2010. I brought in 2 or 3 girls at that time."

After getting confirmation that Tevfik Arif had ordered women from Russia and they had arrived in Antalya, it was documented, based on the video surveillance recording that had been obtained, that the women arrived at the Antalya airport on March 15, 2010 at 7:23 pm, at Musa Chelik's request. They were met at the airport by Kemal Tokay and he took them to the Belek Riksos Premium Hotel.

So, it was established that Kemal Tokay met the foreign women at the airport. In order to verify their identity, their car was stopped by the traffic gendarmerie near the city of Belek at 8:00 pm on March 15, 2010. Among the people in the car were: Vasilisa Savateeva, an underage Russian citizen, born 1994; Stefaniya Ruschikova, an underage German citizen, born 1994; Kseniya Zakharova, an underage Russian citizen, born 1993; Olesa Moskalets, a Russian citizen, born 1992, and Veronika Danilina, a Russian citizen, born 1991. All of this was entered into the record of the investigation. In addition, information was obtained from the video surveillance camera at the hotel and it was established that the girls were also not registered at the hotel itself. He was asked about this, and he answered as follows:

"I brought 2 or 3 girls, models into Turkey, that's true. Girls under 18 can come from Russia only with their parents' permission. One of the girls I brought had moles on her face that weren't visible in the photographs and she had dyed her hair, which again, was not how she looked in the photo. So she was different from what Tevfik Arif, Gyundyuz Akdeniz, and Eldar had seen in the photograph. So, for that reason the girl was sent back that same day. This might have been Olesa Moskalets. I brought in girls by the names of Kseniya Zakharova and Vasilisa Savateeva."

While listening to the recordings of the telephone conversations about the fact that between June 4-10 in Bodrum, the Savarona yacht was anchored near the Riksos Premium hotel and Tevfik Arif and his businessmen planned, through Gyundyuz Akdeniz, to spend time aboard the yacht and regarding this he answered as follows:

"About a month and a half or two months ago, at Gyundyuz Akdeniz's request, I sent models to Bodrum for Tevfik Arif. I sent the girls to Bodrum to the Riksos Premium hotel. At least, that's what they told me. Gyundyuz Akdeniz is Tevfik Arif's man. Like I already said, he was the one I was typically in contact with. I don't know what firm usually pays all the money. They money goes to my hard currency account at the Garanti Bank's branch in Serik. Sometimes Gyundyuz will send me money directly. But more often the money is sent to my account from the firm."

During the interrogation about the fact that on Sept. 28, 2010, a search was conducted on the Savarona, which resulted in the discovery of a large number of foreign women, it was mentioned that even before the start of the operation on the Savarona, foreign women were supplied by Igor and Erkan Akdeniz. Nine women were discovered during the operation, a large quantity of condoms and other tools of intimacy. He was asked, "did you personally bring in women?" to which he answered as follows:

"I didn't send any models on that trip. I spoke to Gyundyuz Akdeniz on that subject once. I call him my uncle. I told him, 'Uncle, why don't you come to me to ask about the girls?' He told me that Igor brought in all the girls. And then I told him during that conversation that if we brought them in, we would earn money off of it."

To the question from whom and in what amounts did he himself and Gyundyuz Akdeniz receive money for choosing the girls, he answered as follows:

"Everyone who acts as an intermediary in this matter gets money."

The recordings from the listening device, the recordings from the surveillance cameras, and the bank statements were entered into the record, on the basis of which it was established that he received \$2,500 from Tevfik Arif for each woman that was brought in. From this amount he paid \$600 to the agency and the girls got \$600 a day. After deducting the expenses for air travel and transportation, each person got \$1,000 and it was shown that this money was subsequently divided between Erkan Akdeniz, Musa Chelik, and Eldar Baygouev. In addition, Khyuliya Erdogan negotiated about the price for the girls and she more than once, hiding behind the word "models," organized trips for the girls for the purpose of prostitution. It was also established that Ebu Bekir Syddk Tekin and Veisi Avdzhi repeatedly ordered prostitutes and contacted Musa Chelik about this. In addition, Tevfik Arif ordered all the women from the start and earlier.

In his testimony, he said that he chose women through a modeling agency and that he also received photographs of girls on his own, by looking for girls on the website www.mod-optimal.com. He constantly updated this site, sending the photographs of the girls who appeared there to his clients. He confirmed the girls that they liked, and in this way, the suspect, although he called them models, was actually searching for prostitutes and ordering them.

Musa Chelik, who took part in the criminal gang's activity, ordered girls for the purpose of prostitution for clients from Antalya, as well as for clients from Europe and America. It was established that he exchanged text messages with a girl by the name of Olga at the phone number 0531 681 38 37 on Feb. 20, 2010 at 6:32 pm. The text messages read as follows: "my address: modoptimal@gmail.com For Europe we will pay 600 euros a day, they will be in France from 22 to 17 and they'll give you \$500 for the help." And this is Olga's answer to this text message: "OK, I understand. I'll send a couple of beautiful brunettes. How do you send money – through Western Union?" Musa Chelik texted an answer to this, "It's not essential whether they're blonde or blonde. The main thing is that they're beautiful. I'll send money through Western Union, but to do that I need your name and surname." Olga texted an answer, "My name is OLGA MAZUR. I'll try to find girls as fast as possible. Call me tomorrow." That same day, Feb. 20, 2010, at 2:06 am, Musa Chelik sent her the following text: "It's nice to meet you, Olga. My name is Musa and I represent the Bei Ti agency. I send girls not only to Europe, but to London, America, and Antalya. But to Antalya all the time." Olga answered him, "And are all of the models for sex or not? I need to know because most of them won't go for sex." To which Musa Chelik answered, "Olga, the client is asking that there be sex." The parties negotiated these terms, but Olga clarified that the prices would be higher in this case and Musa Chelik agreed to that. In this way it was established that Musa Chelik got in touch with Elena, Olga, Olesa, Anna and many other people with whom he negotiated about prostitutes.

It was determined as part of the investigation that he solicited the services of prostitutes, although he claimed that he himself only acted as an intermediary in this matter.

TESTIMONY GIVEN BY THE SUSPECT HULIA ERDOGAN:

She does not agree with the charges brought against her, but she was given the data which includes tapping her conversations. It turned out that she first of all dealt with organization of prostitution in Antalya, then, upon the request of Gunduz Akdeniz and after a meeting with Musa Chelik, she arranged with them that she would traffic women to Turkey from abroad.

It turned out that in the testimony of the detained ones – Mustafa Atesh, Polat Ozturk, Sevgi Uyanyk, Songul Kuru – it was Hulia Erdogan, by the nickname of Buse, who provided prostitutes. Sevgi Uyanyk and Songul Kuru served many times as intermediaries in this sector of Antalya.

Hulia Erdogan played one of the leading roles in the organization of such activities, bringing girls under the cover of participation in animation or as dancers, though in reality they arranged about using them as prostitutes.

Here is what Hulia Erdogan replied to the question whether Mustafa Atesh was going to order a girl as a prostitute and received Hulia's telephone from the girl called Natalya. The explanations follow:

"I spoke on the phone with this girl. She said her name was Buse. I told her I had got her number from Natalya. First we said we needed a dancer. She replied that she had a dancer and asked us to give her a permanent number for connection. I gave her a permanent phone number in the hotel. The woman whom I know as Buse, and who you call Hulia Erdogan, contacted me by this phone. She then told me she had dancers. Any girls at your choice and to your taste. If you wish, you can order them for belly dancing or sexual purposes for a night. I agreed and told her that I needed three girls for my friends. We discussed the price. The woman nicknamed Buse told me: "on the phone, we call these girls "dancers", remember this and call them so from now on". So she wanted us to say "a short program" if we order a girl for a short time and "a long program" if we order girls for the whole night". Thus it was discovered that Hulia Erdogan provided prostitutes, calling them dancers for a cover.

TESTIMONY GIVEN BY THE SUSPECT KEMAL TOKAY:

Kemal Tokay confirmed that upon the instructions of Gunduz Akdeniz he met girls from abroad in the airport of Antalya and provided transfer by a Mercedes Vito (Minibus) with the number 07 AIR 70. On 15.03.2010, upon the instructions of Gunduz Akdeniz, he met the girls at the airport in Antalya, and after leaving the airport he took them to the Rixos Premium hotel. They were stopped by guards for a road check, the passports of the foreign girls were checked, and then they were set free. In the end, he brought the girls to the Rixos Premium hotel, he knew that they were registered at the hotel, but he did not know whose name was used for the registration. He specified one more time that he strictly obeyed the instructions of Gunduz Akdeniz: met girls at the airport and took them to the hotel; he worked in the same way for many other people, providing transfer. He did not know whether there were minors among the coming girls, he just followed the instructions, he pleaded not guilty.

TESTIMONY GIVEN BY THE SUSPECT ELDAR BAYOGLUEV:

He does not admit charges brought against him, he invited the women that were discussed between Tevfik Arif and his friends, he participated in the transfer of these girls, but he did not consider using them as prostitutes.

He was reminded of the conversations in the course of which he found out the height, age and other characteristics of the girls. He refused to answer such questions. He only said that the girls he did not like were really sent back. He admitted sending photos of girls, said that he did not know why a contract conclusion was mentioned in relation to 16-19-year-old girls, he just confirmed that the word "contract" did not mean any "agreement" with women while talking about girls. He pleads not guilty.

In the course of consideration of the received tapping and video recordings, the testimony, given by the suspects and witnesses, was also taken into account. It was discovered that Musa Chelik and Erkan Akdeniz ordered women through Eldar Bayogluiev via a model agency upon the instructions of Tevfik Arif, and after selling women as prostitutes each participant got his share for each woman. In the period between 15 and 20.03.2010, he took part in the transfer of minor girls who then arrived to the airport of Antalya. The cameras recorded how the girls were brought to Rixos Premium hotel, and the girls' passports were taken away. Eldar Bayogluiev, just like the other suspects, was aware of minor girls' arriving and conducted the negotiations related to this subject.

FROM THE TESTIMONY, GIVEN BY THE SUSPECT EKATERINA MAISURADZE, it became clear that he pleaded not guilty.

METHODS OF DISTRIBUTING INCOME FROM CRIMINAL ACTIVITIES AMONG THE PARTICIPANTS OF THE CRIMINAL GROUP – ERKAN AKDENIZ, MUSA CHELIK, GUNDUZ AKDENIZ AND ELDAR BAYOGLUEV

Thanks to the recordings of the bug it was discovered that the income from prostitution, the price of which was agreed upon in advance, was distributed among three persons – Gunduz Akdeniz, Musa Chelik and Erkan Akdeniz, and a share was also given to Eldar Bayogluiev.

For example, on 30.04.2010 negotiations took place between Gunduz Akdeniz and Musa Chelik, which were recorded in the minutes at number 403. They discussed how they are going to distribute the profit in the amount of 3,000 dollars, received from the criminal activity.

Gunduz was asked how the shares of Musa and Erkan would be obtained and how the small sum of the agency would be sent; it was desirable to send the money by transfer from one account to another.

On 14.06.2010, the suspects held negotiations about the arrangement in the period between 06.06.2010 and 10.06.2010, when the foreign women arrived on board the yacht “Savarona”. And after they received their fee from Tevfik Arif, Eldar, Musa Chelik and Gunduz Akdeniz held negotiations on how to distribute the income received. He told Musa Chelik about Gunduz Akdeniz bringing the girls: “Look, now I will send you 10,000, 5,000 of this sum is mine”. Musa Chelik agreed. Gunduz Akdeniz continued the conversation: “also you will add what you owe... then go to the bank and send it to my account”. Musa Chelik replied: “Right, Uncle”. He was supposed to transfer 5,000 liras to his account for the two previous unpaid girls, set aside the accompanying expenses, his share, and the rest had to be sent to his account with Ziraat bank.

In the course of negotiations, held on 14.06.2010 between Eldar Bayogluiev and Musa Chelik, Eldar confirmed that he had transferred the money to Musa’s account, and on the same day, 14.06.2010 at 18:05, a conversation was held, captured by the bug and recorded in the minutes at number 489. They said that the money for the girls, arriving from Russia, had to be transferred to a girl called Svetlana. Svetlana demanded 600 dollars for each person, Musa offered 500, and she agreed; then they discussed the distribution of income for the girls who arrived from Russia.

In the course of tapping the conversations, held on 15.06.2010 between Musa Chelik and Gunduz Akdeniz and recorded in the minutes at number 492, it was discovered in what manner they arranged to share the profit between themselves:

From the minutes number 492:

Musa Chelik: Let’s settle the accounts, so that I could transfer what I owe you

Gunduz Akdeniz: Speak

Musa Chelik: I received 9 thousand dollars now

Gunduz Akdeniz: So?

Musa Chelik: Then 5 thousand dollars in addition

Gunduz Akdeniz: Right

Musa Chelik: Now, how shall we divide these 5 thousand?

Gunduz Akdeniz: What do you mean?

Musa Chelik: The 5 thousand dollars – you told me to count how much you should get

Gunduz Akdeniz: Skip it, don't count it, now make calculations on the other part

Musa Chelik: But this is for you

Gunduz Akdeniz: And what should I count there? This is done, skip it, it comes separately

Musa Chelik: Wait, now we transfer 1200 dollars to this agency

Gunduz Akdeniz: All right

Musa Chelik: Right? Just a minute, Uncle, I'll put it down

Gunduz Akdeniz: Now you're talking about the second 5 thousand, right?

Musa Chelik: No, this is in addition, I'm not asking about this, I don't need to ask about this

Gunduz Akdeniz: Right, don't ask about it, I'm talking about the transferred sum for the two

Musa Chelik: That's what I'm talking about, I'm not asking about it

Gunduz Akdeniz: Okay.

Musa Chelik: Right, then 1200 to the agency

Gunduz Akdeniz: Wait, I'll use a calculator

Musa Chelik: Right, Uncle, let's do so

Gunduz Akdeniz: 5 thousand

Musa Chelik: Right

Gunduz Akdeniz: Minus 1200

Musa Chelik: Right

Gunduz Akdeniz: Minus so...

Musa Chelik: Yes, we have not made any calculations on expenses for a month

Gunduz Akdeniz: Yes

Musa Chelik: This time there are lots of expenses, Uncle

Gunduz Akdeniz: What is it? Phone bills?

Musa Chelik: Yes, quite a lot

Gunduz Akdeniz: Well the, put 300 to the phone

Musa Chelik: OK, Uncle

Gunduz Akdeniz: 3500 remains

Musa Chelik: Yes

Gunduz Akdeniz: So much?

Musa Chelik: Right

Gunduz Akdeniz: What?

Musa Chelik: Yes, that's it, and now we will spend 100 dollars to transfer the sum to Russia

Gunduz Akdeniz: Well.

Musa Chelik: Right, I put it down, too

Gunduz Akdeniz: Wait, 3500

Musa Chelik: Exactly

Gunduz Akdeniz: Minus 100, so it's 3400

Musa Chelik: Right

Gunduz Akdeniz: Divided by three, equals... Yes, exactly so, 3400 divided by three, 1133, or 1130 per each person.

Musa Chelik: Well

Gunduz Akdeniz: Well

Musa Chelik: Right, where do I send it now?

Gunduz Akdeniz: Now I'll give you an account number

Musa Chelik: Okay

Gunduz Akdeniz: What subsidiary are you in?

Musa Chelik: I'm in the one in Serik

Gunduz Akdeniz: Aha, in Serik... Wait, I'll ask my friend from a bank to call you, you will be able to transfer to my account from there

Musa Chelik: Well, OK

Gunduz Akdeniz: 5 what was there? 1300?

Musa Chelik: 6260

Gunduz Akdeniz: What?

Musa Chelik: 7260

Gunduz Akdeniz: Now wait a minute, wait, what was there – 3400 divided by 3, we get 1130

Musa Chelik: Yes, the sum is 7260 then

Gunduz Akdeniz: Multiplied by two, you send 2260

Musa Chelik: Yes

Gunduz Akdeniz: Yes, we get 7260 with five

Musa Chelik: Right

Gunduz Akdeniz: Correct?

Musa Chelik: Yes, correct

As a result of these negotiations it became clear that he found women and gave orders to transfer money to his account. An employee called Nilgun works in Ziraat Bank, Boğaziçi branch; she called Musa Chelik and asked him whether he was going to send 7260 dollars to Mr. Gunduz. The woman asked to send the money to Gunduz's account number 9632353 – 5003, and then she confirmed that the money was charged to the account.

Upon Gunduz Akdeniz's demand, the money was divided into three parts – for himself, Musa Chelik and Erkan Akdeniz. At that, Gunduz Akdeniz ordered to pay Eldar Bayogluev as well and it was established that the money to Eldar Bayogluev's account was sent from Erkan Akdeniz.

On 20.06.2010 at 15:26, a conversation took place between Eldar Bayogluev and Musa Chelik, and its record is registered in the minutes at number 496:

Musa Chelik: Right? Because we spoke with Uncle

Eldar: Yes

Musa Chelik: He told me to give some to Eldar, and I said – yes, we will pay him

Eldar: Yes, that's right

Musa Chelik: Yes, sure, you also have the right to that, you deal a lot with it, just like us

Eldar: Thank you, brother

Musa Chelik: Yes, I lay no claim to that, the one who works and has the right should get his share

Eldar: Exactly so

Musa Chelik: And Erkan gives you as well?

Eldar: Yes, he does

Musa Chelik: He also gives, right?

Eldar: Yes

Musa Chelik: Yes, because he should give as well

Eldar: Mr. Gunduz knows about it, he decides everything for himself

Thus it became clear from the received conversation transcripts how the income was distributed among the criminal group members, and it was also established that it was the subject of many-hour negotiations.

On 17/09/2010, at 15:42 a conversation took place between Erkan Akdeniz and Gunduz Akdeniz, and the received tapping data was recorded in the minutes at number 176. This conversation was related to the upcoming party on board the Savarona at the end of September. Erkan Akdeniz wondered about the state of affairs, and Gunduz Akdeniz said: "there is still nothing about these 25". Erkan Akdeniz: "So Uncle has found them". Gunduz Akdeniz: "There were 22 girls coming, so Igor will bring all of

them”. Erkan Akdeniz: “Do you mean our Ibo?” Then Erkan asked Gunduz Akdeniz: “Will you be there?” Gunduz replied: “Yes, we will also go there, sure, how shall I know, I didn’t understand myself, our people did not say anything, they did not say we had to prepare something”. Then they talked about a big number of girls’ photos sent by e-mail.

Gunduz Akdeniz: Yes, imagine, 22 persons are coming, it’s such a sum of money!

Erkan Akdeniz: That’s what I’m talking about, exactly...

Gunduz Akdeniz: It’s the year’s...

Erkan Akdeniz: You know how good it would be for me?

Gunduz Akdeniz: Yes, I would get from you, we did not say anything to this one

Erkan Akdeniz: I prepared everything, you saw yourself how much we did. They sent 15-fold.

Then it became clear from the conversation that Erkan Akdeniz announced the very high price paid for the girls that Igor brings. He brought them at 5000-6000 dollars and they were going to bring women at a lower price through Eka (Ekaterina Maisuradze) as a new agency. Eldar Bayogluev had to inform them about it, as well as about the distribution of money between the three people: “we will surely divide among the three” – was said in the course of negotiations, and so it proves Eldar’s desire to be related to this money.

The suspect Erkan Akdeniz really brought 3 girls for the party on the yacht “Savarona”, planned to last from September, 25 till October 03, 2010.

On 24.09.2010 at 19:43 we traced an SMS message, recorded in the minutes at number 3, which was on the phone number 0533 815 00 66, belonging to Erkan Akdeniz, and it read as follows:

CONTENTS OF THE SMS MESSAGE: “Pertseva Albina, Batyaykina Lyudmila, Korovina Ekaterina. I couldn’t contact Eldar”. The suspect replied the following to this SMS: “I ordered these women through a VIP model agency, Eldar bought tickets for them”.

JUDICIAL INVESTIGATION, CONDUCTED IN RESPECT OF THE SUSPECTS’ ACTIVITIES IN OUR REPUBLICAN GENERAL PROCURATOR’S OFFICE

A – MAIN INVESTIGATION

As a result of evaluation of messages and conversations, it was established that through the agency of the persons who organized human trafficking, women were brought from Russia and Ukraine for prostitution, trafficking or direct engagement in these activities on the territory of our country. Besides,

this gang made it possible to use minor female citizens from other countries under the pretext of hiring them as models, but in reality the girls were used as prostitutes. These people, being involved in the criminal group, arranged reservation, arrival of girls to the country, including arrangement of all the accompanying expenses. They used their cars to organize the meeting and transfer of girls to the hotel or other appointed places. Thus, the girls were used as prostitutes, and it was arranged by the crime group members.

Acting as swindlers or taking advantage of desperate situation of people, they bought people and located them in temporary accommodations, moved from one place to another, made to participate in prostitution (by sending to a particular country), engaged in human trafficking and conducted criminal activities.

The members of this organization bought girls directly from abroad or via agents, brought the girls to Turkey and accommodated them there, moved them from place to place inside the country; many of them were less than 18 years old, and, according to the amendments introduced to the Criminal Code of the Republic of Turkey, Article 5560, Paragraph 80, such actions are seen as human trafficking (or as charges of rendering intermediary services in trafficking). They used the minor girls that arrived from abroad, selling them to different men as prostitutes. In this connection, the defendants face the charges of organization and management of a criminal gang, whose activities included human trafficking and abetment of prostitution.

5 – IN THE COURSE OF EVALUATION OF THE MATERIAL EVIDENCE COLLECTED, WE GATHERED INFORMATION ON THE SUSPECTS' ACTIVITIES

It was established on the basis of tapping records and video records that the crime group ordered women from Russia and Ukraine as models through model or escort services agencies. Upon the instructions of Tevfik Arif, certain girls were approved, connection was established with them through model agencies, and their photos were received via Internet. After Erkan Akdeniz, Musa Chelik and Eldar Bayogluiev selected the names of the girls, they arranged their arrival; information was passed among them in accordance with hierarchy, Gunduz gave Eldar certain instructions on buying all the plane tickets – arrivals and departures. Upon the instructions of Gunduz Akdeniz, the girls, arriving to Turkey, were met at the airport by Kemal Tokay. Erkan Akdeniz was responsible for finding and bringing women from Russia to the country, and appointed Ekaterina Maisuradze for this purpose as she had a good command of English and spoke Russian. Hulia Erdogan worked jointly with the criminal group, helped them and contributed to the organization of criminal activities: she invited girls to Turkey to work as animators, choosing predominantly pretty girls with a model appearance, who knew the language, and she selected mostly the girls to the criminal group leader's liking. The girls,

who were not used by the customers for sexual purposes, were sent back right from the airport, and all that is proved by reservations made, tickets bought and tapping and video records.

In the course of listening to the records we established the identity of Tevfik Arif (boss) and his assistant Gunduz Akdeniz (Uncle).

As a result of listening it was established that the group arranged for the girls to be transported from Russia to Turkey for their further use as prostitutes; they were found through model agencies or escort services agencies; there were both minors and girls of age, their services were sold in different countries by orders of certain customers. All these actions were performed considering interests and material benefits for the group members.

In accordance with the Criminal Code of the Republic of Turkey, the case under consideration was identified by clause 80/1 as “intimidation and involvement in prostitution by threatening and using force, using population for dirty purposes, lying, taking advantage of people in hard or desperate circumstances, buying people, bringing people from other countries for these purposes or taking people away from the country, moving people from one place to another for these purposes, pushing third persons to participate in such activities”.

However,

“In accordance with Paragraph 80 of the Criminal Code of the Republic of Turkey, when buying minor girls to use as prostitutes is involved, Paragraph 80/2 takes effect, even if there are no intermediary services, these activities are illegal. In this case, the suspects are classified under the article of trafficking or involvement in trafficking”.

From the standpoint of our Criminal Code or the international criminal laws, even if there is an agreement in respect of the minors’ work, here we see trafficking and pushing prostitution; according to our laws, the persons over 18, who decide to engage in prostitution of their own free will, do not bear criminal responsibility, nor do the persons who pay for sexual services, but selling women to third persons, intermediary services in prostitution, arrangement of places for prostitution and management of people to involve them in prostitution are criminal offences and are regulated by Paragraph 227/2 of the Criminal Code of Turkey.

INVESTIGATION WAS CONDUCTED IN RELATION TO CRIMINAL ACTIVITIES AND HUMAN TRAFFICKING IN LIGHT OF ALL AVAILABLE EVIDENCE AND DOCUMENTS.

Upon consideration of all the records of telephone conversations tapped, registered in the minutes, including records on CDs and surveillance cameras records, it became apparent that at the end of March 2010, minor girls were brought to Turkey to be involved in prostitution.

After confirmation was received that Tevfik Arif ordered women from Russia and they came to Antalya, surveillance camera record showed that on 15.03.2010 at 19.23, women arrived in Antalya airport at the request of Musa Chelik; they were met by Kemal Tokay and brought to Rixos Premium hotel in Belek.

So it was proved that Kemal Tokay met foreign women at the airport, and their car was stopped by road guards near Belek on 15.03.2010 at 20.00 to establish identities. The persons in the car included: a minor Russian citizen Vasilisa Savateeva, born in 1994, a minor German citizen Stefania Ruschikova, born in 1994, a minor Russian citizen Kseniya Zakharova, born in 1993, a Russian citizen Olesya Moskalets, born in 1992, a Russian citizen Veronika Danilina, born in 1991. All these facts were recorded in the investigative record; besides, information was received from the surveillance camera in the hotel, and it was proved that the girls were not registered in the hotel. The protocols of their communication records were compared, and information about guests of the hotel, where the girls stayed, was obtained, to establish the fact of offence and confirm the accusations that the minor foreign citizens were going to stay at the hotel with the purpose of having sex. It was established that despite the fact that the hotel outdoor surveillance cameras recorded the moment when the girls entered Rixos Premium hotel in Belek, there was no information about the arrival of the girls in the list of registered hotel guests received on 16.03.2010. After the operation was executed, the list of guests, staying from 15.03.2010 to 21.03.2010, was requested at the hotel on 30.10.2010. Checking showed that minor girls were brought to the country to be involved in prostitution as part of criminal activities, and there was no information about them in the registration log of the hotel where they stayed. In order to keep the girls' age secret, the group members disguised their stay by registering them under their own name. They sold the girls to rich customers. The list of arrivals to/departures from the hotel denounces the suspects as it is mentioned there that Gunduz Akdeniz executed 8 arrivals to/departures from the hotel during three days (March 15, 16 and 17, 2010), and 6 arrivals happened on one and the same day (20.03.2010), while the other 2 departures were made on 21.03.2010.

In the period from 15 till 21.03.2010, the suspect Gunduz Akdeniz was registered in hotel rooms 1506, 1507, 1508, 1511, 1513, 1518, 1525, 1455. At the same time, Gunduz Akdeniz himself remained in room 1513 and the girls were in the other rooms, though this fact was not registered.

Tevfik Arif stayed in room 1501 from 15.03.2010 to 20.03.2010, Eldar Bayogluiev lived in room 1505 from 15.03.2010 to 20.03.2010.

The girls' presence and stay at the hotel were fixed by surveillance cameras, and Tevfik Arif and his friends provided their accommodation in special villas (Paris or Prianus) from 16.03.2010 to 17.03.2010. Kamel Tokay brought the girls from the airport to the hotel by order of Gunduz Akdeniz, and the girls' presence within the hotel territory was recorded by the cameras in the sporting salons where they did sports, and they were also seen in other places of the hotel.

Before the girls' arrival there was a conversation between Gunduz Akdeniz and Musa Chelik, which took place on 04.03.2010. Musa Chelik: "I place Vasilisa, it's those that are 15". In the course of the negotiations between them on 05.03.2010, Musa Chelik told Gunduz: "Uncle, there is a 17-year-old Viktoria, will she do?"

After listening to the record of a telephone conversation, which took place on 11.03.2010 and was recorded in the minutes at number 111, it was proved that Gunduz Akdeniz told Musa Chelik: "Does Vasilisa arrive on 15th or 16th?" Musa replied that she would arrive on the 15th and added that they found three other girls, their names are Olesya, Ksyusha and Vika. On 15.03.2010, after the girls arrived to the airport, Kemal Tokay took Musa Chelik's girls from the airport. On the same day, at 19.23, Kemal Tokay called Musa Chelik and asked him whether he wanted to talk to Vasilisa. Among the girls, who Kemal Tokay met at the airport, were: a Russian citizen Vasilisa Savateeva, born in 1994, a Russian citizen Kseniya Zakharova, born in 1993, a German citizen Stephaniya Ruschikova, born in 1994. All the girls were minors. The other minor girls arrived to the hotel on the 16th and 17th.

The data of tapping and video camera surveillance records, as well as witnesses' testimonies prove that Tevfik Arif, Gunduz Akdeniz, Erkan Akdeniz, Musa Chelik and Eldar Bayoguev are involved in engagement of minor girls in prostitution by bringing them to Turkey, so they were all directly involved in human trafficking.

LEGAL EVALUATION OF FACTS ABOUT MEDIATION OF INDIVIDUALS SUSPECTED OF PROSTITUTION, HUMAN TRAFFICKING AND ORDERING WOMEN FOR PROSTITUTION.

It becomes apparent after analyzing the tapping records, video camera surveillance data, testimonies of the accused and the witnesses and material evidence in the case, that Musa Chelik and Erkan Akdeniz brought women from Russia under the guise of fashion models on behalf of the model agency, making contacts with intermediary model agencies and individuals that carry out their activity in the sphere of prostitution, sending photos of the selected girls by e-mail. Besides, Musa Chelik created a website www.mod.optimal.gmail, where photos were published, and he directed his customers here to choose the girls to their liking for further sale of sexual services.

Musa Chelik and Erkan Akdeniz acted strictly under Gunduz Akdeniz's instructions, especially those concerning the girls for Tevfik Arif; all the instructions were received from Gunduz Akdeniz. Besides, these individuals said that they sold the girls to other clients as well, and distributed the received profit among them. It was also established that Musa Chelik and a woman nicknamed Busa (Hulia Erdogan) met, upon Gunduz Akdeniz's request, to organize the activities related to prostitution in Antalya, and jointly arranged the girls' arrival from abroad.

Eldar Bayogluiev was responsible for buying plane tickets for the girls, dealt with their transfer and location, sent photos to Tevfik Arif.

In the criminal group, Tevfik Arif was called "Boss", his assistant Gunduz Akdeniz had a nickname "Uncle", Eldar Bayogluiev helped to establish contacts, and in his turn he gave instructions in the hierarchic order to Erkan Akdeniz, Musa Chelik and other persons.

Besides the instructions, received from Tevfik Arif, these people followed Gunduz Akdeniz's orders and shared the profit received upon Gunduz's instructions.

Musa Chelik's testimony shows that all the persons, who participated in women's delivery to Turkey, had to receive an award, "any mediators must receive his profit", and this statement adds to all the evidence of their involvement, including the data from bank accounts where the relevant cash receipts were charged.

It becomes apparent after analyzing the tapping and video camera surveillance records, the testimony of the accused and the witnesses and material evidence in the case, that the members of the criminal group delivered women to Turkey for prostitution, and Gunduz Akdeniz, Erkan Akdeniz, Musa Chelik, Eldar Bayogluiev, Hulia Erdogan, and Ekaterina Maisuradze played an active role in it, while they all say that the charges are nothing more than slander.

In the same way as Ebu Bekir Syddyk Tekin and Veysi Avgy ordered prostitutes through Musa Chelik for money, Musa Chelik organized the presence of prostitutes on behalf of Fesikh Tamindge and sold their services. Thus, Ebu Bekir Syddyk Tekin and Veysi Avgy are also mediators in the case of prostitution.

Evaluation of actions conducted by Tevfik Arif with regards to the matter on the placement of an order for women to be used as prostitutes, as well as interest in a business of mediation.

With the joint evaluation of all the allegations, arguments and evidence under the given case, it has become clear that Tevfik Arif took part in the classic organization of prostitution, without earning profit from these affairs. On the contrary, he paid his money to women, agencies and intermediaries so

all of them would supply him with prostitutes. The amounts were paid to all in full and within the agreed limits, also all extraordinary expenses related to the ticket and transfer of these women, were also covered. He in fact, sustained significant losses in this affair.

Well then, where is the interest of Tevfik Arif in this matter, why was he arrested as a suspect in this case?

Extract from the statement by Gundaz Akdeniz:

«During the meetings Tevfik Arif usually calls me on my cell phone, he can inform me that he might be arriving on the 5th, for example. I prepare a hotel for him. Organize seats in restaurants. If he would ever express a desire to rent a yacht, I would do that also. In addition, he comes here to meet businessmen to discuss possible investments. They come accompanied by guests and fashion models. Since they do not know their way around Turkey, I help them out with their transfer. Sometimes Mr Tevfik would be visited by his female model friends, and sometimes he would also ask us to organize a meeting with such girls. We also invite them. I conduct all the accompanying organization for their flights and transfer. This was also sometimes engaged by Eldar Baiyogliev. I was engaged only in the transfer». He went on to state the following:

«I would make calls to Musa Chelik on issues regarding the modeling agency. By engaging his connections, Musa Chelik would provide fashion models from Russia. If I would not be able to reach Musa, I would call Erkan Akdeniz, so that he would bring in the models. He then would make a call to the modeling agency, receive photos of the girls and send them over to me. I would examine them. Depending on the requests and the circumstances of a given day, I would select women by their photos and inform them. In turn, they contact their agencies. After this all the matters are dealt with by Eldar Baiyogliev. All the matters relating to the tickets and booking are resolved by Eldar. When the girls would arrive to Antalya I would call Kemal Tokai and inform him of this. I ask him to get them over to the hotel. They are mainly taken to the Rixos Premium hotel. If the matter takes place in Bodrum, Rixos has its own car hire there. There is a man there by the name of Semikh. I contact him. We tell him the information on the arriving flight. We pick up the guests or the girls from the airport and take them to the hotel».

The following response was received to the inquiry as with regards to the purpose of the transportation of minor and fully aged girls, engaged by Gunduz Akdeniz, as under the instructions from Tevfik Arif, to Turkey and why some of them were sent back, after they were rejected due to their looks:

«We would invite these girls for escort during lunches, dinners and recreational trips. Often Mr. Tevfik and his friends would appear as accompanied by women. Mr. Tevfik would convey regular meetings

with businessmen, in order to discuss investments. They would bring beautiful women and sit them around a table, so that the latter would ornament the table like flowers. His personal girls would usually sit right next to him.

I do not often show Tevfik Arif the photos of the girls. I choose them myself. If the girls are not beautiful enough for us, we send them back. We always explained the cases of sending the girls back as dissatisfaction with their looks. Some girls would even say that they are not comfortable with the conditions and that they are going back ».

Extract from the statement, received from a secret witness nicknamed «Middle East»:

The letter of accusation also contains a statement of a secret witness nicknamed «Middle East», who is closely acquainted with Tevfik Arif and the latter's entourage, he knew Tevfik as the owner of the Labada hotel, he was close to him during Tevfik's cooperation with the hotels Labada, Tekirova Rixos, Belek Rixos and Premium Rixos, and this is what he had to say: «Tevfik Arif, a man that I know very well, is not someone that will provide and sell women under the disguise of fashion models. He is one of those men that can simply have fun with women, accompanied by his friends. He would always personally pay the women, the women that he personally chooses. I know that he would transport the women either to my location or to a location defined by him».

The secret witness had the following to say in a reply to the inquiry whether the girls, arriving for the purpose of prostitution, were registered in the hotel's registration book:

«I learned from the hotel employees, and from the top management, that the arriving girls were not registered in the hotel, and that they were not granted the rooms, in which they resided, and that these rooms were registered to the assistant driver of Gunduz Akdeniz, and that the copies of passports of these girls were not received by the hotel and that the girls were not at all recorded in the list of guests, in addition I was also able to personally verify these non-registrations. The girls, that gradually arrived in Turkey, were placed in the hotels located in different regions. I would receive all this information from the girls themselves....».

The following is also an extract from the statement by the secret witness «Middle East»:

«Fettakh Tamidzhe constructs the Rixos chain hotels, mainly, based on the funding from Russia. Fettakh Tamidzhe became the first to make investment into Rixos and meet other investors, herewith his source was always Tevfik Arif. I know that Tevfik Arif and Fettakh Tamidzhe had a disagreement and that their partnership ended by the fact that they had to part».

During the investigation of all this information, it becomes clear that Tevfik Arif would place orders for prostitutes, for himself and his friends, and that neither him nor his friends gained no profit from this, but he had a significant indirect interest in this matter.

It is possible to surely state, that the presence of prostitutes on the ship, for own and friends' entertainment, was an indirect aim, in actual fact his interest in deriving a gain from this situation was much greater. In this regard it should be considered that in actual fact, Tevfik Arif brought a certain amount of money abroad, the origins of which he would not be able to justify and that he had to spend that money in Turkey; he held some negotiations and invited foreign businessmen to visit Turkey, he offered them to spend some time with young and beautiful fashion models; under the presence of recreation involving entertainment and travel, he in fact held negotiations with these businessmen and received a part of the made investments, this was the true interest of Tevfik Arif during the meeting on Savarona.

This is the cause of Tevfik Arif's accusations, related to the order of women with their consequent role as the prostitutes.

Tevfik Arif was not accused because he ordered this service for himself, but rather because he ordered this service for others (for his friends and businessmen), promoting the trade of services provided by foreign women.

As a conclusion of the consideration of audio interception records, the data received from surveillance cameras, hotel's registration information, the statements by the suspects and witnesses, bank documents, confirming the reception of funds, photos of the selected women and catalogues, it became possible to assert, that the members of the criminal group were engaged in the involvement of women in prostitution, would push them towards such actions, would purchase minor women with the purpose of their sexual services, thus engaging in human trafficking. Having examined all the presented information,

We request for a court proceedings regarding the suspects, we asked that they are accused as under the abovementioned articles, each one individually for the crimes committed, also on behalf of the public we ask to render a ruling on the confiscation of all the property of the accused. 12/11/2010

YUSUF KHAKI DOGAN

31601

Public prosecutor of the Republic

* The given document contains an electronic signature.