

SUPERIOR COURT
OF THE DISTRICT OF COLUMBIA

Holding a Criminal Term
Grand Jury Sworn in on July 17, 2017

THE UNITED STATES OF AMERICA	:	Criminal Nos: 2017 CF3 10331 (Narin)
	:	2017 CF3 11114 (Yildirim)
v.	:	GJO (Akar)
	:	GJO (Dalkiran)
SINAN NARIN,	:	GJO (Erkan, S.)
PDID: 723-623	:	GJO (Erkan, T.)
	:	GJO (Karabay)
EYUP YILDIRIM,	:	GJO (Kayasan)
PDID: 723-944	:	GJO (Kutluca)
	:	GJO (Sumercan)
TURGUT AKAR,	:	GJO (Yildirim, G.)
DCTN: U17028553	:	GJO (Ergunduz)
	:	GJO (Sarman)
ISMAIL DALKIRAN,	:	GJO (Yurteri)
DCTN: U17028554	:	GJO (Ellialti)
	:	GJO (Dereci)
SERVET ERKAN,	:	GJO (Kose)
DCTN: U17028555	:	GJO (Ayar)
	:	GJO (Eren)
TUGAY ERKAN,	:	
DCTN: U17028556	:	Violations:
	:	22 D.C. Code, Sections 1805a(a)(1),
AHMET KARABAY,	:	1805a(a)(2), 3701, 3703;
DCTN: U17028557	:	22 D.C. Code, Sections 402, 3701, 3703;
	:	22 D.C. Code, Sections 402, 3601, 3701,
FERIDE KAYASAN,	:	3703;
DCTN: U17028558	:	22 D.C. Code, Sections 404.01, 3701, 3703;
	:	22 D.C. Code, Sections 404(a)(2), 3701,
LUTFU KUTLUCA,	:	3703;
DCTN: U17028559	:	22 D.C. Code, Sections 404, 3701, 3703
	:	(2001 ed.)
MUSTAFA MURAT SUMERCAN,	:	
DCTN: U17028560	:	(Conspiracy, Bias-Related (Hate) Crime;
	:	Assault with a Dangerous Weapon, Bias-
GOKHAN YILDIRIM,	:	Related (Hate) Crime; Assault with a
DCTN: U17028561	:	Dangerous Weapon of a Senior Citizen, Bias-
	:	Related (Hate) Crime; Aggravated Assault,
ISMAIL ERGUNDUZ,	:	Bias-Related (Hate) Crime; Assault with
DCTN: U17028562	:	Significant Bodily Injury, Bias-Related
	:	(Hate) Crime; Assault, Bias-Related (Hate)
	:	Crime

MEHMET SARMAN, :
DCTN: U17028563 :
 :
HAMZA YURTERI, :
DCTN: U17028564 :
 :
MAHMUT SAMI ELLIALTI, :
DCTN: U17028565 :
 :
AHMET CENGIZHAN DERECE, :
DCTN: U17028566 :
 :
MUHSIN KOSE, :
DCTN: U17028963 :
 :
YUSUF AYAR, :
DCTN: U17028964 :
 :
HARRETTIN EREN, :
DCTN: U17029021 :

The Grand Jury charges:

FIRST COUNT:

The Conspiracy

On or about May 16, 2017, within the District of Columbia, defendants Turgut Akar, Ismail Dalkiran, Servet Erkan, Tugay Erkan, Ahmet Karabay, Feride Kayasan, Lutfu Kutluca, Mustafa Murat Sumercan, Gokhan Yildirim, Ismail Ergunduz, Mehmet Sarman, Hamza Yurteri, Sinan Narin, Eyup Yildirim, Mahmut Sami Ellialti, Ahmet Cengizhan Dereci, Muhsin Kose, Yusuf Ayar, Harrettin Eren, and other persons whose identities are both known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate, and agree together to assault with a dangerous weapon with a shod-foot and to assault, in violation of 22 D.C. Code Sections 402, 404.

Objects of the Conspiracy

The principal goals and purposes of this conspiracy were for the members of the conspiracy, including defendants Turgut Akar, Ismail Dalkiran, Servet Erkan, Tugay Erkan, Ahmet Karabay,

Feride Kayasan, Lutfu Kutluca, Mustafa Murat Sumercan, Gokhan Yildirim, Ismail Ergunduz, Mehmet Sarman, Hamza Yurteri, Sinan Narin, Eyup Yildirim, Mahmut Sami Ellialti, Ahmet Cengizhan Dereci, Muhsin Kose, Yusuf Ayar, Harrettin Eren, and other persons whose identities are both known and unknown to the grand jury, to: (1) assault and kick protesters who were assembled in front of the Turkish Chief of Mission Residence (hereinafter “CMR”) in Sheridan Circle; and (2) assault American law enforcement officers who attempted to stop the continued assault against the protesters.

Background of the Conspiracy

Defendants Turgut Akar (a Turkish security official wearing a suit and tie), Ismail Dalkiran (a Turkish security official wearing a suit and a tie), Servet Erkan (a Turkish security official wearing a suit and tie), Tugay Erkan (a Turkish security official wearing a suit and tie), Ahmet Karabay (a Turkish security official wearing a suit and tie), Feride Kayasan (a Turkish security official wearing a suit), Lutfu Kutluca (a Turkish security official wearing a suit and tie), Mustafa Murat Sumercan (a Turkish security official wearing a suit and tie), Gokhan Yildirim (a Turkish security official wearing a suit and tie), Ismail Ergunduz (a Turkish security official wearing khaki pants and an olive green military-style jacket), Mehmet Sarman (a Turkish security official wearing khaki pants and an olive green military-style jacket), Hamza Yurteri (a Turkish security official wearing khaki pants and an olive green military-style jacket), Sinan Narin (a U.S. citizen), Eyup Yildirim (a U.S. citizen), Mahmut Sami Ellialti (a Canadian citizen), Ahmet Cengizhan Dereci (a Canadian citizen), Muhsin Kose (a Turkish security official wearing a suit and tie), Yusuf Ayar (a Turkish security official wearing a suit and tie), Harrettin Eren (a Turkish security official wearing khaki pants and an olive green military-style jacket), and other persons whose identities are both known and unknown to the grand jury, were members and associates of a group of political allies—

security personnel and supporters of Turkish President Recep Tayyip Erdoğan—who banded together in the District of Columbia on May 16, 2017. The members and associates of this group were bound together by their aversion towards a group of persons who oppose Mr. Erdoğan, support pro-Kurdish political parties in Turkey and Syria, and are of ethnic Kurdish background from Iran, Iraq, Syria, and Turkey (collectively, the “anti-Erdoğan protesters”). The anti-Erdoğan protesters had assembled earlier in the day outside of the White House near the 1600 block of Pennsylvania Avenue N.W, adjacent to Lafayette Square. The anti-Erdoğan protesters assembled to voice their unfavorable opinion of Mr. Erdoğan and his administration based on Mr. Erdoğan’s treatment of Kurdish people in Turkey and Mr. Erdoğan’s policies towards Kurds in Iran, Iraq, and Syria. The anti-Erdoğan protesters chose to demonstrate on May 16, 2017, when Mr. Erdoğan would be visiting the White House to meet with U.S. President Donald Trump. In anticipation of the protest, the anti-Erdoğan protesters obtained a valid permit from the U.S. National Park Service on May 4, 2017.

The anti-Erdoğan protesters peacefully demonstrated outside of the White House while Mr. Erdoğan met with President Trump. After Mr. Erdoğan’s meeting with President Trump concluded, Mr. Erdoğan traveled to the CMR. The anti-Erdoğan protesters changed their protest venue, deciding to protest across from the CMR within Sheridan Circle, to continue to voice their opposition to the Turkish President. Approximately ten to twenty anti-Erdoğan protesters were gathered in the vicinity of Sheridan Circle prior to Mr. Erdoğan’s arrival at the CMR. The anti-Erdoğan protesters were carrying signs and chanting with the use of bullhorns. Some of the signs advocated for the release of Selahattin Demirtaş, the imprisoned Zaza Kurdish leader of the Turkish pro-Kurdish People’s Democratic Party, or HDP. Others carried red, yellow, and green (the colors of the Kurdish people which are banned in Turkey) flags and scarves to indicate their support and/or affiliation with the Kurds.

The members and associates of the conspiracy were pro-Erdoğan civilian supporters, Turkish security personnel, and staff members from the Turkish diplomatic delegation. The Turkish security personnel were clad in suits or khaki pants, olive green military-style jackets, and combat boots. The Turkish security personnel wore earpieces and some were armed with firearms. The members and associates of the conspiracy significantly outnumbered the anti-Erdoğan protesters, growing in size as the protest continued. The members and associates of the conspiracy both vocally and physically opposed the presence of the anti-Erdoğan protesters, yelling threats at and attacking the anti-Erdoğan protesters. After a brief confrontation between the groups and continued demonstration by the anti-Erdoğan protesters, during which time law enforcement attempted to create a physical barrier to restrain the members and associates of the conspiracy, the members and associates of the conspiracy rushed the anti-Erdoğan protesters in a nearly simultaneous, coordinated throng. The members and associates of the conspiracy used threats and physical violence—intensely kicking at protesters—to dispel the anti-Erdoğan protesters, attack the anti-Erdoğan protesters, and blatantly ignore American law enforcement commands to cease the violence. The members and associates of the conspiracy attacked the anti-Erdoğan protesters because of their opposition to Mr. Erdoğan, their support of the HDP, their support of ethnic Kurds, and their belief that the protesters were ethnically Kurdish.

Overt Acts

In furtherance of the conspiracy, and in order to effect the objects thereof, defendants Turgut Akar, Ismail Dalkiran, Servet Erkan, Tugay Erkan, Ahmet Karabay, Feride Kayasan, Lutfu Kutluca, Mustafa Murat Sumercan, Gokhan Yildirim, Ismail Ergunduz, Mehmet Sarman, Hamza Yurteri, Sinan Narin, Eyup Yildirim, Mahmut Sami Ellialti, Ahmet Cengizhan Dereci, Muhsin Kose, Yusuf Ayar, Harrettin Eren, and other persons whose identities are both known and unknown to the grand

jury, alone and in various combinations, in the District of Columbia, directly and indirectly, committed overt acts, including, but not limited to the following:

1. On or about May 16, 2017, Turgut Akar, Ismail Dalkiran, Servet Erkan, Tugay Erkan, Ahmet Karabay, Feride Kayasan, Mustafa Murat Sumercan, Gokhan Yildirim, Ismail Ergunduz, Mehmet Sarman, Hamza Yurteri, Sinan Narin, Eyup Yildirim, Mahmut Sami Ellialti, Ahmet Cengizhan Dereci, Muhsin Kose, Yusuf Ayar, Harrettin Eren, and other persons whose identities are both known and unknown to the grand jury congregated on the Turkish CMR sidewalk before a Metropolitan Police Department (“MPD”) police cordon line near the 1600 block of 23rd Street N.W.

2. On or about May 16, 2017, at approximately 4:05 p.m., Mehmet Sarman, Mahmut Sami Ellialti, Ismail Ergunduz, Gokhan Yildirim, Hamza Yurteri, Sinan Narin, Eyup Yildirim and other persons whose identities are both known and unknown to the grand jury bypassed the MPD cordon and moved toward the collective group of anti-Erdoğan protesters, who were in the street and on the sidewalk.

3. On or about May 16, 2017, at approximately 4:05 p.m., Mehmet Sarman pushed and individual with the initials H.K., an anti-Erdoğan protester, to the ground.

4. On or about May 16, 2017, at approximately 4:05 p.m., a person whose identity is unknown to the grand jury hit H.K. in the face with a flag.

5. On or about May 16, 2017, at approximately 4:05 p.m., Ismail Ergunduz, Gokhan Yildirim, Hamza Yurteri, and Mehmet Sarman punched and kicked Jalal Kheirabadi, an anti-Erdoğan protester.

6. On or about May 16, 2017, at approximately 4:05 p.m., Ismail Ergunduz and Ahmet Cengizhan Dereci kicked Mehmet Tankan, an anti-Erdoğan protester.

7. On or about May 16, 2017, between approximately 4:05 p.m. and 4:13 p.m., Mustafa Murat Sumercan made a throat-slashing motion by moving his hand horizontally across his throat with his palm facing down.

8. On or about May 16, 2017, between approximately 4:05 p.m. and 4:13 p.m., Mustafa Murat Sumercan angrily motioned at the anti-Erdoğan protesters to come over to the sidewalk in front of the CMR.

9. On or about May 16, 2017, between approximately 4:06 p.m. and 4:08 p.m., Gokhan Yildirim, Sinan Narin, Turgut Akar, Mustafa Murat Sumarcan, and other persons whose identities are both known and unknown to the grand jury bumped up against MPD officers at the cordon line, as one MPD officer exclaimed, “They have a right to talk” (referring to the anti-Erdoğan protesters).

10. On or about May 16, 2017, at approximately 4:06 p.m., Gokhan Yildirim told an MPD officer, referring to the protesters, “You need to take them; if you don’t, I will.”

11. On or about May 16, 2017, at approximately 4:06 p.m., Sinan Narin began to scream at an MPD officer, yelling that the Turkish security officials protect Mr. Erdoğan.

12. On or about May 16, 2017, at approximately 4:06 p.m., Sinan Narin yelled, while pointing at Gokhan Yildirim, “Do not touch him.”

13. On or about May 16, 2017, at approximately 4:08 p.m., Eyup Yildirim yelled at an MPD officer and warned the officer of potential violence if the protesters continued their protest.

14. On or about May 16, 2017, at approximately 4:08 p.m., Eyup Yildirim shouted that the anti-Erdoğan protesters were “dirty bastards.”

15. On or about May 16, 2017, at approximately 4:10 p.m., Gokhan Yildirim informed a Secret Service officer, referring to the protesters, “we are waiting you to take them out, because President [Erdoğan] is coming. If you don’t take, I will take. Okay?”

16. On or about May 16, 2017, at approximately 4:11 p.m., Eyup Yildirim shouted at one of the anti-Erdoğan protesters, “shut the fuck up, bitch!”

17. On or about May 16, 2017, at approximately 4:11 p.m., the pro-Erdoğan supporters began to play music on a loudspeaker. The music was the “mehter march,” which is a Turkish nationalist song.

18. On or about May 16, 2017, at approximately 4:12 p.m., Sinan Narin approached an MPD officer, exclaiming, “My President is coming and you guys aren’t doing anything.”

19. On or about May 16, 2017, between approximately 4:05 p.m. and 4:13 p.m., Muhsin Kose, Yusuf Ayar, Feride Kayasan, Ahmet Karabay, and other persons whose identities are known and unknown to the grand jury communicated with one another via earpieces.

20. On or about May 16, 2017, at approximately 4:13 p.m., Turgut Akar, Ismail Dalkiran, Servet Erkan, Tugay Erkan, Ahmet Karabay, Feride Kayasan, Mustafa Murat Sumercan, Gokhan Yildirim, Ismail Ergunduz, Mehmet Sarman, Hamza Yurteri, Sinan Narin, Eyup Yildirim, Mahmut Sami Ellialti, Ahmet Cengizhan Dereci, Harrettin Eren, and other persons whose identities are both known and unknown to the grand jury aggressively pushed through the MPD cordon, crossed the street into Sheridan Circle, and commenced a second assault on the anti-Erdoğan protesters.

21. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, Servet Erkan, Feride Kayasan, and other persons whose identities are both known and unknown to the grand jury kicked and punched Jalal Kheirabadi.

22. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, Feride Kayasan pushed H.K.

23. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, Mehmet Sarman, Eyup Yildirim, Sinan Narin, Mahmut Sami Ellialti, and Hamza Yurteri kicked Elif Genc, an anti-Erdoğan protester.

24. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, Ahmet Cengizhan Dereci grabbed anti-Erdoğan protester Murat Yasa and threw him to the ground.

25. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, Tugay Erkan, Ismail Ergunduz, Ahmet Cengizhan Dereci, Gokhan Yildirim, Eyup Yildirim, and another person whose identity is unknown to the grand jury, kicked Murat Yasa in the head and face.

26. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, Eyup Yildirim threatened Murat Yasa, telling Murat Yasa that he was going to make life miserable for the Kurds.

27. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, Hamza Yurteri, Mehmet Sarman, Sinan Narin, Eyup Yildirim, Mahmut Sami Ellialti, and other persons whose identities are both known and unknown to the grand jury kicked anti-Erdoğan protester Lusik Usoyan's head and body causing Lusik Usoyan to lose consciousness.

28. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, Ismail Dalkiran grabbed anti-Erdoğan protester Ceren Borazan from behind, placed her in a tight chokehold, and threw her on the ground.

29. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, Harrettin Eren and another person whose identity is unknown to the grand jury assaulted anti-Erdoğan protester Mahir Ayhan, kicking him in his lower back and face.

30. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, Servet Erkan and Mahmut Sami Ellialti kicked anti-Erdoğan protester Abbas Azizi in the chest, back, arms, and head.

31. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, Ismail Ergunduz, Turgut Akar, Ahmet Karabay, Mustafa Murat Sumercan, Ahmet Cengizhan Dereci, Harrettin Eren, and another person whose identity is unknown to the grand jury kicked and punched Mehmet Tankan.

32. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, persons whose identities are both known and unknown to the grand jury pushed an individual with the initials O.Y., an anti-Erdoğan protester, and C.A., a seven-year child, to the ground and kicked them.

33. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, persons whose identities are both known and unknown to the grand jury punched and kicked an anti-Erdoğan protester with the initials S.J.A.

34. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, persons whose identities are both known and unknown to the grand jury attacked an anti-Erdoğan protester with the initials Y.A., kicking him in his face and head.

35. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, Mustafa Murat Sumercan attacked Heewa Arya, an anti-Erdoğan protester, kicking him as he laid on the ground.

36. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, persons whose identities are both known and unknown to the grand jury attacked H.K., grabbing H.K. by its hair, punching it, dragging it to the ground, and causing it to experience multiple seizures.

37. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, persons whose identities are both known and unknown to the grand jury punched and kicked an individual with the initials D.D., an anti-Erdoğan protester.

38. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, persons whose identities are both known and unknown to the grand jury kicked an individual with the initials M.O., an anti-Erdoğan protester.

39. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, persons whose identities are both known and unknown to the grand jury chased and individual with the initials K.K., an anti-Erdoğan protester, who managed to get away without injury.

40. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, persons whose identities are both known and unknown to the grand jury chased an individual with the initials P.B., an anti-Erdoğan protester, who managed to get away without injury.

41. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, persons whose identities are both known and unknown to the grand jury chased an anti-Erdoğan protester an individual with the initials R.I. and its four-year old child, P.I., both of whom managed to get away without injury.

42. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, Turgut Akar, Ismail Dalkiran, Servet Erkan, Tugay Erkan, Ahmet Karabay, Feride Kayasan, Lutfu Kutluca, Mustafa Murat Sumercan, Gokhan Yildirim, Ismail Ergunduz, Mehmet Sarman, Hamza Yurteri, Harrettin Eren, and other persons whose identities are both known and unknown to the grand jury ignored MPD and United States Secret Service officers' commands to stop the assault against the anti-Erdoğan protesters and return to the sidewalk in front of the CMR.

43. On or about May 16, 2017, at approximately 4:13 p.m. or soon thereafter, Ismail Ergunduz, Hamza Yurteri, Mehmet Sarman, and other persons whose identities are both known and unknown to the grand jury took the anti-Erdoğan protesters' signs, tore them up, and either threw them on the ground or carried them across the street to the Turkish CMR.

44. On or about May 16, 2017, at approximately 6:17 p.m. or soon thereafter, Feride Kayasan approached anti-Erdoğan protester Lacey Macauley and grabbed Lacey Macauley's hand as Lacey Macauley continued to peacefully protest.

45. On or about May 16, 2017, at approximately 6:17 p.m. or soon thereafter, Feride Kayasan, Lutfu Kutluca, Tugay Erkan, and another person whose identity is unknown to the grand jury, surrounded Lacey Macauley.

46. On or about May 16, 2017, at approximately 6:17 p.m. or soon thereafter, a person whose identity is unknown to the grand jury grabbed Lacey Macauley's anti-Erdoğan sign, crumpled it up, and carried it away.

47. On or about May 16, 2017, at approximately 6:17 p.m. or soon thereafter, Feride Kayasan placed her hand over Lacey Macauley's mouth in an attempt to silence her. (Conspiracy, in violation of 22 D.C. Code, Sections 1805a(a)(1), 1805a(a)(2) (2001 ed.)).

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of anti-Erdoğan protesters. (Conspiracy, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Sections 1805a(a)(1), 1805a(a)(2), 3701, 3703 (2001 ed.)).

SECOND COUNT:

On or about May 16, 2017, within the District of Columbia, Mehmet Sarman, Hamza Yurteri, Sinan Narin, Eyup Yildirim, and Mahmut Sami Ellialti assaulted Lusik Usoyan with a dangerous weapon, that is, a shod foot. (Assault with a Dangerous Weapon, in violation of 22 D.C. Code, Section 402 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Lusik Usoyan. (Assault with a Dangerous Weapon, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 402, 3701, 3703 (2001 ed.)).

THIRD COUNT:

On or about May 16, 2017, within the District of Columbia, Mehmet Sarman, Hamza Yurteri, Sinan Narin, Eyup Yildirim, and Mahmut Sami Ellialti did by any means, knowingly and purposely cause serious bodily injury to Lusik Usoyan. (Aggravated Assault, in violation of 22 D.C. Code, Section 404.01 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Lusik Usoyan. (Aggravated Assault, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 404.01, 3701, 3703 (2001 ed.)).

FOURTH COUNT:

On or about May 16, 2017, within the District of Columbia, Servet Erkan and Mahmut Sami Ellialti assaulted Abbas Azizi, a person sixty years of age or older, with a dangerous weapon, that is, a shod foot. (Assault with a Dangerous Weapon of a Senior Citizen, in violation of 22 D.C. Code, Section 402, 3601 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Abbas Azizi. (Assault with Dangerous Weapon of a Senior Citizen, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 402, 3601, 3701, 3703 (2001 ed.)).

FIFTH COUNT:

On or about May 16, 2017, within the District of Columbia, Servet Erkan and Mahmut Sami Ellialti unlawfully assaulted and threatened Abbas Azizi in a menacing manner and intentionally, knowingly, and recklessly caused significant bodily injury to Abbas Azizi. (Assault with Significant Bodily Injury, in violation of 22 D.C. Code, Section 404(a)(2) (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Abbas Azizi. (Assault with Significant Bodily Injury, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 404(a)(2), 3701, 3703 (2001 ed.)).

SIXTH COUNT:

On or about May 16, 2017, within the District of Columbia, Tugay Erkan, Gokhan Yildirim, Ismail Ergunduz, Eyup Yildirim, and Ahmet Cengizhan Dereci assaulted Murat Yasa, a person sixty years of age or older, with a dangerous weapon, that is, a shod foot. (Assault with a Dangerous Weapon of a Senior Citizen, in violation of 22 D.C. Code, Section 402, 3601 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Murat Yasa. (Assault with a Dangerous Weapon of a Senior Citizen, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 402, 3601, 3701, 3703 (2001 ed.)).

SEVENTH COUNT:

On or about May 16, 2017, within the District of Columbia, Tugay Erkan, Gokhan Yildirim, Ismail Ergunduz, Eyup Yildirim, and Ahmet Cengizhan Dereci unlawfully assaulted and threatened Murat Yasa, in a menacing manner and intentionally, knowingly, and recklessly caused significant bodily injury to Murat Yasa. (Assault with Significant Bodily Injury, in violation of 22 D.C. Code, Section 404(a)(2) (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Murat Yasa. (Assault with Significant Bodily Injury, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 404(a)(2), 3701, 3703 (2001 ed.)).

EIGHTH COUNT:

On or about May 16, 2017, within the District of Columbia, Mustafa Murat Sumercan, assaulted Heewa Arya with a dangerous weapon, that is, a shod foot. (Assault with a Dangerous Weapon, in violation of 22 D.C. Code, Section 402 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Heewa Arya. (Assault with a Dangerous Weapon, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 402, 3701, 3703 (2001 ed.)).

NINTH COUNT:

On or about May 16, 2017, within the District of Columbia, Mustafa Murat Sumercan, unlawfully assaulted and threatened Heewa Arya in a menacing manner and intentionally, knowingly, and recklessly caused significant bodily injury to Heewa Arya. (Assault with Significant Bodily Injury, in violation of 22 D.C. Code, Section 404(a)(2) (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Heewa Arya. (Assault with Significant Bodily Injury, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 404(a)(2), 3701, 3703 (2001 ed.)).

TENTH COUNT:

On or about May 16, 2017, within the District of Columbia, Turgut Akar, Ahmet Karabay, Mustafa Murat Sumercan, Ismail Ergunduz, Ahmet Cengizhan Dereci, and Harrettin Eren assaulted Mehmet Tankan with a dangerous weapon, that is, a shod foot. (Assault with a Dangerous Weapon, in violation of 22 D.C. Code, Section 402 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Mehmet Tankan. (Assault with a Dangerous Weapon, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 402, 3701, 3703 (2001 ed.)).

ELEVENTH COUNT:

On or about May 16, 2017, within the District of Columbia, Turgut Akar, Ahmet Karabay, Mustafa Murat Sumercan, Ismail Ergunduz, Ahmet Cengizhan Dereci, and Harrettin Eren unlawfully assaulted and threatened Mehmet Tankan in a menacing manner. (Assault, in violation of 22 D.C. Code, Section 404 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Mehmet Tankan. (Assault, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 404, 3701, 3703 (2001 ed.)).

TWELFTH COUNT:

On or about May 16, 2017, within the District of Columbia, Ismail Dalkiran assaulted Ceren Borazan with a dangerous weapon, that is, a shod foot. (Assault with a Dangerous Weapon, in violation of 22 D.C. Code, Section 402 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Ceren Borazan. (Assault with a Dangerous Weapon, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 402, 3701, 3703 (2001 ed.)).

THIRTEENTH COUNT:

On or about May 16, 2017, within the District of Columbia, Ismail Dalkiran unlawfully assaulted and threatened Ceren Borazan in a menacing manner. (Assault, in violation of 22 D.C. Code, Section 404 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Ceren Borazan. (Assault, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 404, 3701, 3703 (2001 ed.)).

FOURTEENTH COUNT:

On or about May 16, 2017, within the District of Columbia, Harrettin Eren assaulted Mahir Ayhan with a dangerous weapon, that is, a shod foot. (Assault with a Dangerous Weapon, in violation of 22 D.C. Code, Section 402 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Mahir Ayhan. (Assault with a Dangerous Weapon, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 402, 3701, 3703 (2001 ed.)).

FIFTEENTH COUNT:

On or about May 16, 2017, within the District of Columbia, Harrettin Eren unlawfully assaulted and threatened Mahir Ayhan in a menacing manner. (Assault, in violation of 22 D.C. Code, Section 404 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Mahir Ayhan. (Assault, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 404, 3701, 3703 (2001 ed.)).

SIXTEENTH COUNT:

On or about May 16, 2017, within the District of Columbia, Servet Erkan and Feride Kayasan assaulted Jalal Kheirabadi with a dangerous weapon, that is, a shod foot. (Assault with a Dangerous Weapon, in violation of 22 D.C. Code, Section 402 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Jalal Kheirabadi. (Assault with a Dangerous Weapon, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 402, 3701, 3703 (2001 ed.)).

SEVENTEENTH COUNT:

On or about May 16, 2017, within the District of Columbia, Servet Erkan and Feride Kayasan assaulted and threatened Jalal Kheirabadi in a menacing manner. (Assault, in violation of 22 D.C. Code, Section 404 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Jalal Kheirabadi. (Assault, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 404, 3701, 3703 (2001 ed.)).

EIGHTEENTH COUNT:

On or about May 16, 2017, within the District of Columbia, Mehmet Sarman, Hamza Yurteri, Sinan Narin, and Eyup Yildirim assaulted Elif Genc with a dangerous weapon, that is, a shod foot. (Assault with a Dangerous Weapon, in violation of 22 D.C. Code, Section 402 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Elif Genc. (Assault with a Dangerous Weapon, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 402, 3701, 3703 (2001 ed.)).

NINETEENTH COUNT:

On or about May 16, 2017, within the District of Columbia, Mehmet Sarman, Hamza Yurteri, Sinan Narin, and Eyup Yildirim unlawfully assaulted and threatened Elif Genc in a menacing manner. (Assault, in violation of 22 D.C. Code, Section 404 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of Elif Genc. (Assault, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 404, 3701, 3703 (2001 ed.)).

TWENTIETH COUNT:

On or about May 16, 2017, within the District of Columbia, Feride Kayasan unlawfully assaulted and threatened an individual with the initials H.K. in a menacing manner. (Assault, in violation of 22 D.C. Code, Section 404 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived ethnicity and political affiliation of an individual with the initials H.K. (Assault, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 404, 3701, 3703 (2001 ed.)).

TWENTY-FIRST COUNT

On or about May 16, 2017, within the District of Columbia, Tugay Erkan, Feride Kayasan, and Lutfu Kutluca unlawfully assaulted and threatened Lacey Macauley in a menacing manner. (Assault, in violation of 22 D.C. Code, Section 404 (2001 ed.))

The Grand Jury Further Charges:

That such criminal act demonstrated the prejudice based on the actual or perceived political affiliation of Lacey Macauley. (Assault, Bias-Related (Hate) Crime, in violation of 22 D.C. Code, Section 1805a, 3701, 3703 (2001 ed.)).

Channing D. Phillips/066

CHANNING D. PHILLIPS
United States Attorney for the District of Columbia

A TRUE BILL

Foreperson