



TURKEY-ISRAEL RELATIONS

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INTRODUCTION

Turkish-Israeli relations are unique in the Muslim world. While most Muslim-majority nations have not recognised the State of Israel, Turkey has. In fact, despite its “No” vote in the United Nations General Assembly regarding the UNSCOP Plan, Turkey

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was nonetheless the first Muslim-majority nation to recognise the newly established State of Israel. There have, in fact, been periods when the two nations worked closely together and had strong ties in pursuit of common interests. The relationship between the two countries strengthened as Turkey sought to retain strong ties with the West and emphasised the fact that Turkey was a secular, democratic republic. The relationship between Turkey and Israel has deteriorated significantly since Turkey's Islamist political parties have gained power and have denigrated Israel as Turkey sought to re-establish its leadership in the Sunni world. This paper discusses Turkey's historically amicable relations with Israel under Turkey's secular governments and how the Turkish relationship with Israel has changed due to the increasing Islamisation of the Turkish government, which, in recent years, has pushed Turkish-Israeli relations to an all-time low.

I. SECULAR BASIS OF MODERN TURKEY UNDER ATATÜRK

Modern Turkey has its roots in the once-powerful Ottoman Empire, an empire that experienced a long decline that led to its final collapse following World War I. The war hastened the Ottoman Empire's decline and resulted in the partition of the empire under the Treaty of Sèvres¹, a treaty of peace between the Ottoman government and the Allied Powers, signed on 10 August 1920². The treaty was orchestrated by the Allied Powers who were concerned with the preservation of "their existing commercial and economic privileges in Turkey"³. As with all treaties following WWI, the terms of the Treaty of Sèvres were harsh: they imposed enormous reparation payments, divided the land of the once-vast Ottoman Empire, stripped the

¹ Treaty of Peace with Turkey, 10 Aug. 1920, GR. BRIT. T.S. No. 11 (1920) (Cmd. 964).

² A.E. Montgomery, *VIII. The Making of the Treaty of Sèvres of 10 August 1920*, 15 HIST. J. 775 (1972).

³ *Id.* at 782.

Empire of its ability to govern its economy, and placed restrictive limits on the size and ability of the Ottoman military⁴. Especially galling for the Turks was the massive award of territory to the victors, including Greece⁵. The Treaty of Sèvres also included the ceding of the land of Palestine and acceptance of the Balfour Declaration—which ultimately led to the creation of the British Mandate for Palestine⁶.

The last Ottoman sultan, Sultan Muhammad VI, accepted the Treaty of Sèvres, which, though painful and humiliating, left the Sultan with a rump empire⁷. Nonetheless, backed by popular dissent, Mustafa Kemal Atatürk, a young military leader inspired by European progress and secular ideas, gained power⁸. Atatürk led a nationalistic rebellion in a war for Turkish independence in which they defeated the Greeks, deposed the Sultan, and forced a conference at Lausanne to revise the terms of the Treaty of Sèvres⁹, a treaty that never went into effect. The negotiations at Lausanne resulted in the Treaty of Lausanne, signed on 24 July 1923¹⁰. The revised treaty defined the borders of modern-day Turkey in return for Turkey's renunciation of its claim to all other land that comprised the former Ottoman Empire¹¹.

Even prior to the Lausanne peace conference, Atatürk had been the driving force behind the creation of the Great National Assembly in Ankara, a representative parliamentary body of which Atatürk was president¹². Turkey was formally proclaimed a republic on 29 October

⁴ Philip Marshall Brown, *From Sèvres to Lausanne*, 18 AM. J. INT'L L. 113, 113–14 (1924).

⁵ *Id.* at 113.

⁶ See Treaty of Peace with Turkey, *supra* note 1, at art. 95.

⁷ PATRICK KARL O'BRIEN, OXFORD ATLAS OF WORLD HISTORY 179 (2002).

⁸ *Brief History of Republic of Turkey*, U. MICH., http://www.umich.edu/~turkish/links/reptr_brhist.html (last visited 19 Feb. 2015).

⁹ *Id.*

¹⁰ Brown, *supra* note 4, at 113.

¹¹ Treaty of Peace with Turkey, 24 July 1923, in II THE TREATIES OF PEACE 1919–1923 (1924), available at http://wwi.lib.byu.edu/index.php/Treaty_of_Lausanne.

¹² *Mustafa Kemal Atatürk*, REPUBLIC OF TURKEY MFA, <http://www.mfa.gov.tr/mus->

1923, and Atatürk became its first president¹³. Atatürk implemented swift and drastic measures to bring about the secularisation of Turkey. He abolished the caliphate in 1924, banned the Arabic language and removed Islam as the official State religion in 1928, instituted bans on traditional Islamic dress for both men and women, and modeled Turkey's legal system on European civil codes, even going so far as to create a parliament elected by universal male suffrage, which, in 1934, was extended to include women¹⁴.

Atatürk remained Turkey's president until his death in 1938¹⁵. His successor, İsmet İnönü, "warily steered a neutral course through the first five years of World War II"¹⁶. Atatürk's political and social reforms, followed by İnönü's choice to side with the Allies in World War II, resulted in a post-WWII Turkey that was strongly aligned with the West¹⁷. This same shift, along with Turkey's rejection of Islamic values in the public square, had a large influence on Turkey's relations with the nascent State of Israel, created in 1948¹⁸. Following the conclusion of World War II, Turkey took further steps to align itself with the West, such as its participation in the 1945 conference that founded the United Nations¹⁹. A major step in realigning with the West was Turkey's decision to join NATO, an alliance established to contain the USSR²⁰.

tafa-kemal-ataturk.en.mfa (last visited 19 Feb. 2015).

¹³ *Id.*

¹⁴ *Brief History of Republic of Turkey*, *supra* note 8; *see also Mustafa Kemal Atatürk*, *supra* note 12.

¹⁵ *Id.*

¹⁶ *Brief History of Republic of Turkey*, *supra* note 8.

¹⁷ *See* JOHN M. VANDERLIPPE, *THE POLITICS OF TURKISH DEMOCRACY* 1 (2012).

¹⁸ *Kemal Atatürk (1881–1938)*, BBC HISTORY, http://www.bbc.co.uk/history/historic_figures/ataturk_kemal.shtml (last visited 10 Mar. 2015).

¹⁹ *Brief History of Republic of Turkey*, *supra* note 8.

²⁰ DAN ARBELL, *CTR. FOR MIDDLE EAST POL'Y AT BROOKINGS*, *THE U.S.-TURKEY-ISRAEL TRIANGLE* 4 (2014); *see also* David Kushner, *Before and Beyond The "Freedom Flotilla": Understanding Turkish-Israeli Relations*, 4 *ISR. J. FOREIGN AFF.* 21, 21 (2010).

At the same time, Turkey's relationship with Israel began on somewhat rocky ground when Turkey was one of thirteen States that voted against the United Nations Partition Plan for Palestine, a plan based on the UN Special Committee on Palestine's call for the partition of Mandatory Palestine and the establishment of a Jewish State alongside an Arab State²¹. Despite its opposition to the original plan, on 28 March 1949, Turkey became the first Muslim-majority nation to recognise the State of Israel²². Following this recognition, the two governments quickly established diplomatic ties²³. Turkey and Israel shared many common regional interests, interests that they attempted to protect by establishing military and economic ties with one another²⁴. Essentially, “[b]oth viewed themselves as pro-Western, secular, and democratic ‘outsiders’ in the region . . .”²⁵.

Turkey and the growing Israeli State had common interests, to be sure, but as early as 1956 their differences—and the political realities of the Middle East—began to put a strain on the relationship. For instance, Turkey was aligned with Iraq under the 1955 Baghdad Pact²⁶. This alliance, an attempt to form a military alliance similar to NATO in order to thwart an expansionist USSR across the Middle East, ultimately resulted in the formation of the Central Treaty Organization (CENTO)²⁷. In the fallout of the 1956 Sinai

²¹ ISR. STATE ARCHIVES, *Introduction to ISR. STATE ARCHIVES, ISRAEL-TURKEY RELATIONS, 1961–1967*, [hereinafter ISRAEL-TURKEY RELATIONS, 1961–1967] available at http://archives.gov.il/archivegov_eng/publications/electronicpirsum/Israel-turkey/israel-turkeyintroduction.htm.

²² Kushner, *supra* note 20, at 21.

²³ ISRAEL-TURKEY RELATIONS, 1961–1967, *supra* note 21.

²⁴ Matthew S. Cohen & Charles D. Freilich, *Breakdown and Possible Restart: Turkish-Israeli Relations Under the AKP*, 8 ISR. J. FOREIGN AFF. 39, 40 (2014).

²⁵ *Id.*

²⁶ *Central Treaty Organization (CENTO)*, ENCYCLOPEDIA IRANICA, <http://www.iranicaonline.org/articles/central-treaty-organization-cento-a-mutual-defense-and-economic-cooperation-pact-among-persia-turkey-and-pakistan-wi> (last visited 10 Mar. 2015).

²⁷ *Id.*

Campaign²⁸, Turkish Prime Minister Adnan Menderes pressured the government to terminate relations with Israel, a move that he felt would show solidarity with Iraqi Prime Minister Nuri as-Said, who had publicly condemned the Israeli, French, and British invasion of Egypt²⁹. Ultimately, the Turkish government compromised by downgrading its level of relations with Israel from “that of ministers to [that of] chargé d’affaires”³⁰.

Despite this reduced level of official relations between Israel and Turkey, changes in the region led Turkey to reconsider its approach. Egypt and Syria had formed the United Arab Republic in 1958, and the pro-Western Iraqi monarchy had been overthrown³¹. Thus, Turkey felt threatened. Israel’s sense of isolation, coupled with Turkey’s similar sense of isolation, once again led the two nations to establish more friendly relations. Secret meetings between Israeli Prime Minister David Ben-Gurion and Turkish Prime Minister Adnan Menderes resulted in a series of agreements to cooperate through diplomacy, economics, and the military³². These agreements, which lasted into the mid-1960s, comprised the Peripheral Alliance, also called the Periphery Pact because it linked Turkey, Israel, Iran, and Ethiopia, countries on the periphery of the Middle East³³.

Although the Peripheral Alliance benefitted both countries, it technically existed in secret³⁴. The Turkish government had never fully normalised its relations with Israel following the Sinai Campaign; however, when a civilian government led by the former

²⁸ The Sinai Campaign of 1956 was Israel’s move to root out “Palestinian guerrilla incursions from Egypt and to try to remove an Egyptian blockade of its port of Eilat”. *1956: The Sinai Campaign*, BBC NEWS (6 May 2008), http://news.bbc.co.uk/2/hi/middle_east/7377716.stm.

²⁹ ISRAEL-TURKEY RELATIONS, *supra* note 21.

³⁰ *Id.*; see also ARBELL, *supra* note 20, at 5.

³¹ Kushner, *supra* note 20, at 22; see also ARBELL, *supra* note 20, at 5.

³² Kushner, *supra* note 20, at 22; see also ARBELL, *supra* note 20, at 5.

³³ *Id.*; ISRAEL-TURKEY RELATIONS, *supra* note 21.

³⁴ ARBELL, *supra* note 20, at 5.

Prime Minister, Ismet İnönü, took power in 1961, Israel thought that relations could be restored³⁵. Turkey, however, had other ideas. Turkish leaders made overtures that they intended to normalise relations but only at the “right time”, a time that seemed to never come³⁶. This hedging on the part of Turkey revealed an important reality about Turkey’s view of its own relationship with Israel: “[D]espite its clear interest in developing and maintaining closer ties with Israel, Turkey simultaneously tried to keep Israel at arm’s length because of Turkey’s desire to be on good terms with the Arab bloc”³⁷.

Following the relative success of the Peripheral Alliance, success that accompanied the two nations’ increasing economic cooperation, the “Cyprus question” began to negatively affect Turkish-Israeli relations. In a nutshell, the Cyprus question involves the conflict between the Greek Cypriot population’s desire for “Enosis”, full unification with Greece, and the Turkish Cypriot population’s desire to form two separate states, dividing the island between the two communities³⁸. Initially, Israel had taken sides with Turkey on the issue, but when Cyprus gained independence in 1960 and its president became an independent ruler, Israel had hoped to improve relations with Cyprus³⁹. Although Israel had attempted to remain neutral after hostilities and a series of violent riots broke out on Cyprus—due to the Cypriot President having demanded a constitutional amendment that would have reduced the rights of the Turkish minority—Turkey responded harshly to a supportive message that Israel had sent to the Cypriot president, further weakening the relationship between Turkey and Israel⁴⁰.

³⁵ ISRAEL-TURKEY RELATIONS, 1961–1967, *supra* note 21.

³⁶ *Id.*

³⁷ ARBELL, *supra* note 20, at 5; *see also* ISRAEL-TURKEY RELATIONS, 1961–1967, *supra* note 21.

³⁸ *Factbox: Key Issues in Cyprus Dispute*, REUTERS (10 Nov. 2009), <http://www.reuters.com/article/2009/11/10/us-cyprus-conflict-factbox-idUSTRE5A94EV20091110>.

³⁹ ISRAEL-TURKEY RELATIONS, 1961–1967, *supra* note 21.

⁴⁰ *Id.*

By the late 1960s, it had become apparent that Turkey was shifting its political sympathies toward the Arab world. The Turkish government voiced strong objections to the situation before, during, and after the Six-Day War of 1967, all the while claiming technical neutrality⁴¹. However, Turkish statements in opposition to Israel marked a shift in Turkey's position⁴². For instance, in reaction to Israel's capture of territory as a result of the Six-Day War, Turkish Prime Minister Demirel said, "I am against annexing territory by force. If that door is opened, there will be no end to it"⁴³. At an emergency UN General Assembly session immediately following the Six-Day War, Turkey voted against the Soviet-proposed resolution that "demanded [Israel] withdraw its armed forces from the occupied territories and pay compensation to the Arab countries"⁴⁴. However, Turkey worked with several other Muslim nations to draft a proposal that was ultimately adopted⁴⁵. This resolution provided that Israel would not extend Israeli law's jurisdiction to East Jerusalem and would avoid doing so in the future⁴⁶.

The global oil crisis of the 1970s had a dramatic effect on Turkey's economy, leading it to pursue even closer relations with its Arab neighbors, to the further detriment of its relations with Israel⁴⁷. Turkey strengthened its economic ties with Iraq and Libya, two Arab countries awash in oil⁴⁸. At the same time, Turkey took several public actions that demonstrated its shift toward a more pro-Arab and anti-Israel stance. For instance, in 1975 Turkey recognised the Palestinian Liberation Organization (PLO) as the sole representative of the Palestinian people⁴⁹. It also voted to adopt UN General Assembly

⁴¹ *Id.*; ARBELL, *supra* note 20, at 6.

⁴² *Id.*; *see also* Kushner, *supra* note 20, at 22.

⁴³ ISRAEL-TURKEY RELATIONS, 1961–1967, *supra* note 21.

⁴⁴ *Id.*

⁴⁵ *See id.*

⁴⁶ *Id.*

⁴⁷ *See* ARBELL, *supra* note 20, at 6.

⁴⁸ *Id.*; *see also* Kushner, *supra* note 20, at 22.

⁴⁹ ARBELL, *supra* note 20, at 6.

Resolution 3379 which equated Zionism with racism⁵⁰. In 1979, Turkey allowed Yasir Arafat to open a PLO office in Ankara⁵¹. The most significant action came as a reaction to Israel's 1980 Jerusalem Act, which combined East and West Jerusalem into a unified capital⁵². Turkey responded to the Act by officially downgrading diplomatic relations with Israel "to the level of second secretary"⁵³. It also leveraged the Jerusalem Act in its favour, using the incident to obtain financial assistance from concerned Arab nations⁵⁴.

Following a period of decline in Turkish-Israeli relations, there was a period of improvement and growth in relations between the countries from the late 1980s into the 1990s. Turkey finally formalised its diplomatic relations with Israel when it upgraded Israel's representation to the level of ambassador in 1991⁵⁵. Israel was surprised by this development, but the upgrade followed on the heels of the 1991 Madrid Conference and reflected Turkey's desire to play a larger role in the peace talks⁵⁶.

Turkey's more friendly relationship with Israel during this period was largely driven by the growing role that the military played in Turkey's domestic politics⁵⁷. Turkey hoped to take advantage of military cooperation with Israel in order to further its own regional aspirations⁵⁸. Leading up to the 1990s, Turkey's relationship with its European allies and with the United States had grown increasingly strained because of issues with its Kurdish population, such that during the 1990s, Turkey found it "hard to obtain Western technology

⁵⁰ G.A. Res. 3379 (XXX), U.N. Doc. A/RES/3379 (XXX) (10 Nov. 1975), *revoked by* G.A. Res. 46/86, U.N. Doc. A/RES/46/86 (16 Dec. 1991).

⁵¹ ARBELL, *supra* note 20, at 6.

⁵² *Id.*; *see also* Kushner, *supra* note 20, at 22.

⁵³ *Id.*

⁵⁴ *Id.*

⁵⁵ Arbell, *supra* note 20, at 6; *see also* Kushner, *supra* note 20, at 23.

⁵⁶ Özlem Tür, *Turkey and Israel in the 2000s—From Cooperation to Conflict*, ISR. STUDIES, Fall 2012, at 45, 47.

⁵⁷ *Id.* at 47.

⁵⁸ *Id.*

and military equipment”⁵⁹. Turkey’s improved relations with Israel “was a pragmatic approach by which the military-bureaucratic elite could counter the challenges posed by Turkey’s European allies”⁶⁰.

In addition to the military benefits Turkey received from an improved relationship with Israel, Turkey also improved its relations with Israel because of the economic benefits reaped by both parties⁶¹. In the interest of preserving their economic growth, officials in both nations avoided “public political support for one another on internationally controversial issues”⁶². Apparently, this toned-down approach paid off for both countries, as they conducted several high level visits throughout the 1990s. In February 1996, the two nations instituted a military cooperation agreement providing for joint military exercises, joint air force and naval training, and Israel’s sale of missiles and jet planes to Turkey⁶³. The agreement also placed a strong focus on fighting extremism and terrorism in the region⁶⁴.

During Turkish President Demirel’s March 1996 visit to Israel, the two nations reached a Free Trade Agreement⁶⁵. The agreement provided for “cooperation in areas such as investment, construction, manufacturing, environment”, and more⁶⁶. “This high-level cooperation withstood even the year-long term of office (1996–97) of the government headed by the Islamist leader Necmettin Erbakan, as well as ongoing pressure emanating from popular sympathies toward” the

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ ARBELL, *supra* note 20, at 7; *see also* Kushner, *supra* note 20, at 23.

⁶² Alan Makovsky, *Turkish-Israeli Ties in the Context of Israeli-Arab Tension*, THE WASH. INST. (10 Nov. 2000), <http://www.washingtoninstitute.org/policy-analysis/view/turkish-israeli-ties-in-the-context-of-israeli-arab-tension>.

⁶³ ARBELL, *supra* note 20, at 7; *see also* Kushner, *supra* note 20, at 23; Tür, *supra* note 56, at 48.

⁶⁴ *Id.*

⁶⁵ Soner Cagaptay & Tyler Evans, *The Unexpected Vitality of Turkish-Israeli Trade*, RES. NOTES: THE WASH. INST., June 2012, at 1.

⁶⁶ Tür, *supra* note 56, at 48.

Palestinians⁶⁷. Turkey's renewed relationship with Israel also drew the ire of Arab nations. For instance, the Lebanese daily newspaper, *al-Safir*, wrote that "the alliance was directed against all Arabs, and that it exclusively served Israeli interests at the expense of Arab and Muslim interests"⁶⁸.

The relationship between Turkey and Israel grew stronger as the 1990s drew to a close, but in Turkey, political opposition to Israeli relations began to gain a foothold. When Necmettin Erbakan and the Refâh Partisi (Welfare Party) briefly gained office in 1996, Erbakan vowed to "eliminate all traces of this 'Jewish-based system' and reorient Turkey from the Jewish-led West (including the EU) towards the Muslim world"⁶⁹. Thus, in the mid-to-late 1990s, Turkish relations with Israel became a sticking point in domestic Turkish politics—Turkey's military bureaucracy sought to strengthen relations, while Islamist political parties, like the Welfare Party, strove to weaken such relations⁷⁰.

Despite the growing domestic disagreement, Turkish Chief of General Staff Huseyin Karadayi visited Israel in 1997 and Israel reciprocated with visits to Ankara by Foreign Minister David Levy and Defence Minister Yitzhak Mordechai, a sign that Turkish-Israeli relations remained strong in the face of the Welfare Party's growing opposition⁷¹. By 2002, trade had more than doubled, from \$449 million in 1996 to over \$1.2 billion⁷².

Several events during the period at the close of the 20th century had a negative effect on Turkish-Israeli relations. First, the capture of Kurdistan Workers' Party (PKK) leader Abdullah Ocalan and the effective defeat of the PKK itself removed a military threat that

⁶⁷ Kushner, *supra* note 20, at 23.

⁶⁸ Tür, *supra* note 56, at 48.

⁶⁹ *Id.* at 49.

⁷⁰ *Id.*

⁷¹ *Id.*

⁷² Cagaptay & Evans, *supra* note 65, at 1.

had driven Turkish foreign policy since the 1980s⁷³. Second, the Adana Accords with Syria removed the threat to Turkey's southern border, thereby allowing Turkey to place less emphasis on the military necessities that had motivated it to repair relations with Israel⁷⁴. In addition, Turkey's grant of candidate status before the EU led it to shift its goals toward reform and "the adoption of a more EU-style foreign policy orientation and instruments"⁷⁵.

The Justice and Development Party's (AKP) 2002 electoral victory—building on reform that had begun under the previous coalition government, which included the Islamist Fazilet (Virtue) Party—was the beginning of a significant decline in Turkish-Israeli relations⁷⁶. The AKP was formed in August 2001 by a group of Islamist politicians including, Recep Tayyip Erdoğan, Abdullah Gül, and Bülent Arınç⁷⁷. Many in the political sphere viewed the AKP as merely a continuation of the Erbakan-led Welfare Party⁷⁸. The AKP gained a majority in the 2002 elections, forming Turkey's first majority government since the 1980s⁷⁹. The AKP's platform included promises to re-orient toward the West, to respect a secular Republic, and to depart from political Islam in favour of a secular, conservative democracy⁸⁰. At the time of the AKP's rise to power, many Turkish writers saw the issue of Turkish-Israeli relations as a benchmark for measuring the sincerity of the AKP's promise to institute a secular, Western-oriented government⁸¹. The AKP's subsequent moves to

⁷³ Tür, *supra* note 56, at 50.

⁷⁴ *Id.*

⁷⁵ *Id.*

⁷⁶ Cohen & Freilich, *supra* note 24, at 39.

⁷⁷ Hakan Yavuz, *Adalet ve Kalkınma Partisi (AKP)*, OXFORD ENCYCLOPEDIA ISLAMIC WORLD, http://www.oxfordislamicstudies.com/article/opr/t236/e0924?_hi=0&_pos=8 (last visited 10 Mar. 2015).

⁷⁸ Tür, *supra* note 56, at 51.

⁷⁹ *Id.*; see also Thomas Patrick Carroll, *Turkey's Justice and Development Party: A Model for Democratic Islam?*, MIDDLE EAST INTELLIGENCE BULLETIN, June/July 2004, http://www.meforum.org/meib/articles/0407_t1.htm.

⁸⁰ Tür, *supra* note 56, at 51.

⁸¹ *Id.*

harm Turkish relations with Israel, discussed in detail below, can, therefore, be seen as evidence that the AKP's original promises of reform were less than totally honest.

Erdoğan in particular played a large role in orchestrating the creation of the AKP, a party that “emerged from the ashes of the mostly Islamist entities of [the] Welfare and Virtue [P]arties that were closed down by the Constitutional Court on charges of being a forum for and proponent of anti-secular activities”⁸². Erdoğan spent his early political career as part of the Welfare Party, making his breakthrough in 1994 when he was elected Mayor of Istanbul⁸³. Although the Welfare Party achieved brief success when it joined in a coalition government in 1996, the party head, Necmettin Erbakan, “became Turkey’s first defiantly Islamist prime minister”⁸⁴. Erbakan was a vocal proponent of the idea that the political violence Turkey experienced in the 1970s was caused by Zionism alone⁸⁵. This view—now referred to as political Islam—has endured within Turkish political parties despite the ban of the National Salvation Party (NSP) in 1981 and the Welfare Party in 1998⁸⁶.

Erbakan’s policies led to what was called a “post-modern coup”: he was ousted from office in 1997, and the military led investigations against several Islamic groups that had gained ground during Erbakan’s government⁸⁷. Erdoğan was affected by these investigations

⁸² Yavuz, *supra* note 77.

⁸³ Mustafa Akyol, *The Making of Turkey’s Prime Minister*, HURRIYET DAILY NEWS (31 Oct. 2010), <http://www.hurriyetdailynews.com/default.aspx?pageid=438&n=the-making-of-tayyip-erdogan-2010-10-31>.

⁸⁴ *Id.*

⁸⁵ Rifat N. Bali, *The Image of the Jew in the Rhetoric of Political Islam in Turkey*, CEMOTI (1999), <http://www.cemoti.revues.org/590#quotation>.

⁸⁶ Seth J. Frantzman, *Terra Incognita: Will Erdogan Ever Overreach?*, JERUSALEM POST (12 Mar. 2014), <http://www.jpost.com/Opinion/Columnists/Terra-Incognita-Will-Erdogan-ever-overreach-345195>.

⁸⁷ *Turkish Generals Go on Trial Over 1997 ‘Post-Modern Coup’*, REUTERS (2 Sep. 2013), <http://www.reuters.com/article/2013/09/02/us-turkey-army-coup-idUSBRE9810B220130902>.

in 1998 when he received a ten-month prison sentence for a speech in which he criticised the dissolution of the Welfare Party⁸⁸, a result of Turkey's Constitutional Court banning the party⁸⁹. Specifically, Erdoğan had quoted lines from a poem dealing with the Turkish War of Liberation: "The mosques are our barracks, the domes our helmets, the minarets our bayonets and the faithful our soldiers"⁹⁰. In addition to the ten-month sentence, Erdoğan was ostensibly banned from politics for the rest of his life⁹¹.

Despite his political ban, in 2001 Erdoğan and others formed the AKP. When the party won a majority in 2002, Erdoğan, as party head, could not become the prime minister because his 1998 political ban was still effective⁹². Abdullah Gül, another founding member of the AKP, became the prime minister, but in December 2002, the Supreme Election Board canceled the general election results because of voting irregularities⁹³. The new election took place on 9 February 2003, but, in the meantime, the government changed the law to renew Erdoğan's eligibility for political office⁹⁴. After Erdoğan won a parliamentary seat in the by-election, he was asked to form a new government⁹⁵. Gül duly resigned his post as the AKP Prime Minister to make way for Erdoğan, and in 2003, less than five years after supposedly being banned from politics forever, Erdoğan became the Prime Minister of Turkey⁹⁶.

Erdoğan entered office with a foreign policy situation that allowed him to justify building close relationships with Muslim nations at the

⁸⁸ Frantzman, *supra* note 86.

⁸⁹ Yavuz, *supra* note 77.

⁹⁰ Akyol, *supra* note 83.

⁹¹ Yavuz, *supra* note 77.

⁹² Akyol, *supra* note 83.

⁹³ *Id.*

⁹⁴ *Turkish PM Quits for Erdogan*, CNN (11 Mar. 2003), <http://edition.cnn.com/2003/WORLD/europe/03/11/turkey.elections/>.

⁹⁵ *Id.*

⁹⁶ *Id.*; see also Akyol, *supra* note 83.

expense of Turkey's relationship with Israel. For instance, the Iraq War "and the common threat perceptions of other regional powers such as Syria and Iran, brought Turkey closer to these countries"⁹⁷. A specific event that increased Turkey's reputation in the Muslim world was its rejection of the 1 March 2003 Resolution that would have allowed the United States to open a northern front in the Iraq War⁹⁸. Regional developments—such as the "Arab Spring" uprisings in Tunisia and Egypt—were opposed by Israel but well received by Turkey, yet another disconnect in the relationship between the two⁹⁹.

Even before the AKP's rise to power, Erdoğan and other party leaders made public statements against Israel and in favour of the Palestinian cause, a trend that would only grow as the AKP remained in power. For instance, after Ariel Sharon took power in Israel, Erdoğan was quoted as saying: "The Sharon government is in fact moving in the direction of state terrorism"¹⁰⁰. Then-Prime Minister Bülent Ecevit called Israel's actions toward Palestine a "genocide", and another top AKP official, Bülent Arınç, compared Israeli Prime Minister Sharon to Adolf Hitler¹⁰¹. The timing of Erdoğan's statements about Israel and Palestine—directly before the Organisation of Islamic Cooperation elections where Turkey was vying for the presidency—strongly suggests that he was using the Palestinian issue to his political advantage¹⁰².

These statements and many similar examples from the time after the AKP took power were a signal of the gradual decline in relations between Turkey and Israel that would occur during the first decade of the millennium. Some claimed that the AKP's harsher stance toward Israel was undertaken because a majority of Turkish citizens were

⁹⁷ Tür, *supra* note 56, at 51.

⁹⁸ *Id.* at 57.

⁹⁹ *Id.* at 59–60.

¹⁰⁰ *Id.* at 53.

¹⁰¹ *Id.*

¹⁰² *Id.*

sympathetic to the Palestinian cause¹⁰³. The effect of such statements was that Turkey's relationship with Israel grew increasingly strained, while its relationship with Muslim countries in the region grew stronger¹⁰⁴. By 2005, Turkish-Israeli relations had reached a new low, due in part to Erdoğan's refusal to meet with Israel's Deputy Prime Minister Olmert in July 2004¹⁰⁵. On the same day that Erdoğan ignored his scheduled meeting with Olmert, he, instead, met with Syrian Prime Minister el-Otri¹⁰⁶.

In the face of such tension between the two countries, they also made efforts to repair relations. Multiple Turkish representatives, including Abdullah Gül, traveled to Israel in late 2004 and early 2005, and Turkish Chief of General Staff İlker Başbuğ¹⁰⁷ led a military dialogue meeting¹⁰⁸. In 2005, Turkey signaled an earnest desire to mend relations, a shift that was shown in Erdoğan's May 2005 visit to Israel¹⁰⁹. This attempt to mend relations was likely pragmatic, as the AKP desired to foster close relations among Middle East nations, not to mention the reality that it had also strained Turkey's relations with the US since coming to power and the surest way to improve those relations was to soften its stance toward Israel¹¹⁰.

Yet, in 2006, Turkey became the first non-Arab country to officially meet with Hamas when a Hamas delegation led by Khaled Meshaal visited Ankara following Hamas' victory in the Palestinian

¹⁰³ *Id.*

¹⁰⁴ *Id.* at 54.

¹⁰⁵ *Id.*

¹⁰⁶ *Id.*

¹⁰⁷ İlker Başbuğ was arrested in 2012 "on charges of leading a terrorist organization aimed at toppling the democratically elected government". *Turkey's Former Chief of Staff İlker Başbuğ Released from Jail After Top Court Ruling*, HURRIYET DAILY NEWS (7 Mar. 2014), <http://www.hurriyetdailynews.com/turkeys-former-chief-of-staff-ilker-basbug-released-from-jail-after-top-court-ruling.aspx?page-ID=238&nid=63321>.

¹⁰⁸ Tür, *supra* note 56, at 54.

¹⁰⁹ *Id.*

¹¹⁰ *Id.* at 55.

parliamentary elections¹¹¹. The Israeli Prime Minister, through a spokesman, stated that Turkey's reception of Hamas was "a mistake that can deeply hurt [bilateral] relations", and so it did¹¹². With tense relations due to the Palestinian question still lingering, Turkey attempted to mediate Israel's dispute with Syria¹¹³. This mediation seemed to be successful throughout 2008, but when Israel initiated Operation Cast Lead at the close of 2008, relations took a nose dive from which they have not since recovered¹¹⁴.

After receiving word that Israel had begun Operation Cast Lead, Erdoğan accused Israel of hypocrisy, saying that Israelis spoke of peace in one place while "killing and bombing children" in another¹¹⁵. At the January 2009 World Economic Forum in Davos, Erdoğan confronted President Shimon Peres, saying, "When it comes to killing, you know well how to kill"¹¹⁶. Turkey followed these comments by excluding Israel from their previously scheduled joint military exercises¹¹⁷. In this same period, a nationally syndicated Turkish TV series named *Ayrılık* depicted Israeli soldiers as blood-thirsty killers who enjoyed killing Palestinian civilians at random¹¹⁸. It was in this political climate that a Turkish NGO began making plans to join in the Free Gaza Movement, an attempt to break Israel's naval blockade of Gaza.

¹¹¹ *Id.*; *Hamas' Meshaal: We Received Support and Advice from Turkey*, HURRIYET DAILY NEWS (17 Feb. 2006), www.hurriyetdailynews.com/default.aspx?pageid=438&n=hamas-meshaal-we-received-support-and-advice-from-turkey-2006-02-17.

¹¹² Tür, *supra* note 56, at 55.

¹¹³ *Id.*

¹¹⁴ *Id.* at 56.

¹¹⁵ *Id.*

¹¹⁶ *Id.* at 56; *see also* Katrin Bennhold, *Leaders of Turkey and Israel Clash at Davos Panel*, N.Y. TIMES (29 Jan. 2009), http://www.nytimes.com/2009/01/30/world/europe/30clash.html?_r=0.

¹¹⁷ Tür, *supra* note 56, at 56.

¹¹⁸ *Id.*; *see also* Donald MacIntyre, *Israel Vents Fury at Ally Turkey over 'Barbaric' TV Drama*, INDEP. (16 Oct. 2009), <http://www.independent.co.uk/news/world/middle-east/israel-vents-fury-at-ally-turkey-over-barbaric-tv-drama-1803653.html>.

II. THE MAVI MARMARA INCIDENT

After Hamas gained control of Gaza in 2006, Israel instituted a naval blockade of Gaza to help restrict the flow of military and militarily useful goods into the Hamas-controlled region¹¹⁹. In response, several groups worked together to organise a flotilla that would attempt to break the naval blockade¹²⁰. Among the main organisers was the Turkish charity, the Humanitarian Relief Foundation (IHH)¹²¹.

On 30 May 2010, Israel attempted to avoid a confrontation with the flotilla by offering it dockage at an Israeli port so the goods being shipped could be inspected and transported to Gaza, but the flotilla refused¹²². The flotilla's refusal inexorably led to the Israelis' having to enforce the blockade by military means. When Israeli forces boarded the flotilla's six vessels on 31 May 2010, the only vessel whose passengers chose to fight was the Mavi Marmara, a vessel owned and controlled by IHH members¹²³. The IHH activists "attacked Israeli soldiers with steel clubs and knives as the soldiers were being lowered onto the deck by helicopters"¹²⁴. The Israeli soldiers were forced to return fire in self-defence, and nine activists were killed with several more wounded¹²⁵.

In response to the Mavi Marmara incident, Erdoğan accused Israel of lying about the IHH's possession of weapons, calling the raid "inhumane state terrorism"¹²⁶. He made his, and Turkey's, position

¹¹⁹ Joshua Mitnick, *Flotilla Assault Spurs Crisis*, WALL ST. J. (1 June 2010), <http://www.wsj.com/articles/SB10001424052748703703704575277632709673018>.

¹²⁰ *Id.*

¹²¹ *Id.*

¹²² *Id.*

¹²³ Marc Champion & Margaret Coker, *Turkish Charity Group Sounds Defiant Note*, WALL ST. J. (4 June 2010), <http://www.wsj.com/articles/SB10001424052748704025304575284081264400448>.

¹²⁴ Mitnick, *supra* note 119.

¹²⁵ *Id.*

¹²⁶ Sabrina Tavernise, *Raid Jeopardizes Turkey Relations*, N.Y. TIMES (31 May 2010),

clear when he also said, “today is a turning point in history. Nothing will be the same again”¹²⁷. Further anti-Israel rhetoric was spoken by Turkish officials at an emergency UN Security Council meeting, a meeting that was called for by Turkey¹²⁸. At the meeting, then-Foreign Minister Davutoğlu referred to Israel’s actions as “banditry and piracy . . . murder conducted by a state . . . and barbarism”¹²⁹. Turkey’s actions in response to the incident included expulsion of the Israeli ambassador from Turkey¹³⁰, recalling its own ambassador from Israel, cancelling joint military exercises, halting cooperation in the energy field, and demanding that Israel publicly apologise, compensate the victims’ families, and lift the blockade of Gaza¹³¹.

RELATIONSHIP SINCE 2010

When the United Nations published the so-called Palmer Report after a year-long investigation into the Mavi Marmara incident, Turkey continued its acrimonious rhetoric. The UN report found that Israel’s actions in forming the blockade were legal, albeit its use of force in the boarding question was “excessive and unreasonable”¹³². Then-Turkish President Gül called the ruling “null and void”, while Erdoğan said “it means nothing to us”¹³³. In other remarks about the UN report and the incident itself, Erdoğan stated that the Mavi Marmara incident was “cause for war but we decided to act in line with

<http://www.nytimes.com/2010/06/01/world/middleeast/01turkey.html>.

¹²⁷ Marc Champion, *Turkey Lashes out at Israel and Denounces ‘Massacre’*, WALL ST. J., 2 June 2010, at A11.

¹²⁸ Carol Migdalovitz, *Israel’s Blockade of Gaza, the Mavi Marmara Incident, and Its Aftermath*, CONG. RES. SERV. 5 (23 June 2010), <https://www.fas.org/sgp/crs/mideast/R41275.pdf>. See also Robert Weston Ash, *The Mavi Marmara Trial: Politicising the Turkish Justice System*, 1 J. CTR. FOR STUDY OF L. & PUB. POL’Y AT OXFORD 49 (2015).

¹²⁹ *Id.*

¹³⁰ *Israel and Turkey: Can It Get Worse?*, THE ECONOMIST (10 Sept. 2011), <http://www.economist.com/node/21528687>.

¹³¹ Migdalovitz, *supra* note 128, at 14.

¹³² *Israel and Turkey: Can It Get Worse?*, *supra* note 130.

¹³³ *Id.*

Turkey's grandeur and showed patience"¹³⁴.

The Mavi Marmara incident was the culmination of the tension that had grown between Turkey and Israel regarding the Palestinian issue. As discussed previously, Erdoğan and the AKP took political advantage of popular Turkish support for the Palestinian people, but the AKP's support of Hamas and Hamas' continuing policy of violence toward Israel are indications that there are deep ideological ties between the two groups.

Hamas is not formally considered a terrorist organisation in Turkey although most of Turkey's Western allies consider it to be one¹³⁵. Despite being a NATO member and an aspiring member of the European Union, questions about Turkey's allegiances have arisen for several reasons¹³⁶. For one, Erdoğan has gone on record stating that Hamas is not a terrorist group and he has repeatedly vowed to visit Gaza¹³⁷. Further, top AKP officials have met with top Hamas leadership since as early as 2006 for the purpose of developing the relationship between the two groups; this occurred at the same time that Turkey's relationship with Israel suffered¹³⁸. In Ankara,

¹³⁴ Suzan Fraser, *Turkey: Gaza Flotilla Raid Was 'Cause for War'*, WORLD POST (12 Sept. 2011), http://www.huffingtonpost.com/2011/09/12/turkey-gaza-flotilla-raid_n_958362.html.

¹³⁵ "Hamas is on the list of terrorist organizations of the United States, the European Union, Canada and several other countries, but not on that of the UN Security Council and it is not considered a terrorist organization in Turkey." Pinar Tremblay, *Is Turkey Hamas' New Headquarters?*, AL MONITOR (25 Aug. 2014), <http://www.al-monitor.com/pulse/originals/2014/08/turkey-palestine-israel-gaza-hamas-meshal-kidnapping.html>. *But see* Alan Cowell, *European Court Reverses Designation of Hamas as a Terrorist Organization*, N.Y. TIMES (17 Dec. 2014), <http://www.nytimes.com/2014/12/18/world/europe/hamas-palestinian-statehoodvote-european-parliament.html> (reporting that a European Union court has reversed this designation for the bloc on 17 December 2014).

¹³⁶ Jonathan Schanzer, *Why Is Turkey Sheltering a Dangerous Hamas Operative?*, FOREIGN POL'Y (17 Sept. 2013), <http://foreignpolicy.com/2013/09/17/thorn-in-the-side/>.

¹³⁷ *Id.*

¹³⁸ Fadi Elhousseini, *Will Erdogan Visit Gaza?*, WASH. INST. (28 June 2013), <http://www.washingtoninstitute.org/policy-analysis/view/will-erdogan-visit-gaza>.

Erdoğan has held highly publicised meetings with Hamas leader Khaled Meshaal and the Gaza administration's Prime Minister, Ismail Haniyeh¹³⁹.

Although President Erdoğan has never followed through on his plans to personally visit Gaza¹⁴⁰, through his meetings with top Hamas officials, Erdoğan and his government have attempted to further the Palestinian cause in Gaza. Usame Hamdan, a Hamas spokesperson, said that at the 2013 meetings, Erdoğan and the Hamas leadership discussed "the construction of Israeli settlements and Israel's 'imposition policies' aimed at the Palestinian economy"¹⁴¹. Another topic that was discussed at the meeting was Turkey's hope that Hamas could come to a reconciliation with the other main Palestinian representative group, Fatah¹⁴². Other top AKP officials attended the meetings, including then-Foreign Minister Ahmet Davutoğlu, a man who was appointed Prime Minister after Erdoğan assumed the presidency in 2014¹⁴³.

In addition to aiding Hamas on a national political level, including the donation of over \$300 million of "foreign aid"¹⁴⁴, Turkey has also allowed many Hamas operatives to operate out of Turkey. Among the most notorious Hamas members to be given shelter in Turkey is Saleh al-Arouri, a man who is identified by Hamas as the founder of the Izz al-Din al-Qassam Brigades¹⁴⁵. Arouri is generally seen as the head of Hamas operations originating in Turkey, and he is believed to have planned the Summer 2014 kidnapping of three Israeli teens,

¹³⁹ *Turkish PM Erdoğan Meets Hamas Leader Meshal and Gaza PM Haniyeh*, HURRIYET DAILY NEWS (18 June 2013), <http://www.hurriyetdailynews.com/turkish-pm-erdogan-meets-hamas-leader-meshal-and-gaza-pm-haniyeh.aspx?pageID=238&nID=49066&NewsCatID=338>.

¹⁴⁰ Elhuseini, *supra* note 138.

¹⁴¹ *Turkish PM Erdoğan Meets Hamas Leader*, *supra* note 139.

¹⁴² *Id.*

¹⁴³ *Id.*

¹⁴⁴ Schanzer, *supra* note 136.

¹⁴⁵ *Id.*; *Saleh Al-Aruri, AL-QASSAM*, http://www.qassam.ps/prisoner-37-Saleh_Al_Aruri.html (last visited 5 Jan. 2015).

the kidnapping that led to the 2014 Gaza War¹⁴⁶. A 2014 news report quoted an anonymous Hamas member as confirming “that Turkey is indeed used as a base by Hamas operatives led by Salah al-Arouri, a Hamas leader based in Turkey who has amassed significant power within the terror group’s infrastructure and directs his own wing from the NATO country”¹⁴⁷.

Beyond Arouri himself, Turkey has consistently hosted other Hamas operatives, including ten Hamas members who were released by Israel as part of the 2011 deal to free kidnapped Israeli soldier Gilad Shalit¹⁴⁸. Many of these operatives were in prison following convictions for murder and kidnapping; yet, in Turkey, they “attend local universities, join Turkish organizations, and play a role in its politics, and also appear to travel freely into and out of the country”¹⁴⁹.

Further, an Israeli news source reported in February 2015 that: “Turkey has become a Hamas hotbed, and members of the organization’s military wing are undergoing military training on Turkish soil, with the knowledge, support and assistance of the local authorities”¹⁵⁰. The report claims that Hamas has set up a “West Bank and Jerusalem Headquarters” in Istanbul after it was expelled from Damascus in 2011¹⁵¹. This source asserts that Arouri recruits West Bank and Gaza Strip residents studying in Arab nations and then sends them to military training camps outside of Istanbul¹⁵². The

¹⁴⁶ Yoni Ben Menachem, *Hamas’ New Base in Turkey*, JERUSALEM CTR. FOR PUB. AFF. (29 Dec. 2014), <http://jcpa.org/hamas-new-base-turkey/>.

¹⁴⁷ Aaron Klein, *Hamas Admits: ‘We Have Headquarters in Turkey’*, WND (2 Dec. 2014), <http://www.wnd.com/2014/12/hamas-admits-we-have-headquarters-in-turkey/>.

¹⁴⁸ Jonathan Schanzer, *Lying Down With Dogs*, FOREIGN POL’Y (20 Aug. 2014), <http://foreignpolicy.com/2014/08/20/lying-down-with-dogs/>.

¹⁴⁹ *Id.*

¹⁵⁰ Alex Fishman, *Forced from Damascus, Hamas Establishing Itself in Turkey*, YNETNEWS.COM (02 Feb. 2015), <http://www.ynetnews.com/articles/0,7340,L4630331,00.html>.

¹⁵¹ *Id.*

¹⁵² *Id.*

report claims that recruits are then sent to Syria to further enhance their military capabilities and then sent right back to the West Bank and the Gaza Strip to join Hamas operatives there¹⁵³.

In August 2015, Israeli news reported that Turkey has asked Arouri to leave the country¹⁵⁴. While Hamas denied this claim¹⁵⁵, Turkish Foreign Ministry informed media that “Arouri is not in Turkey at the moment”¹⁵⁶. Hamas further claimed that Arouri “is carrying out his activities as usual and is travelling between a number of countries, including Turkey, Qatar and Lebanon”¹⁵⁷. The source also said, this “does not mean that Turkey has expelled [Arouri]”¹⁵⁸.

Interestingly, in December 2014, eight months prior to the news of Arouri’s departure from Turkey to Qatar, Turkey had concluded a joint agreement with Qatar to establish a Supreme Strategic Committee¹⁵⁹. This was among the first in a series of steps taken after Erdoğan’s victory in Turkey’s 2014 elections that demonstrates his intentions for Turkey’s future. The Emir of Qatar said that one goal of the agreement was to focus on “the importance of restoring the rights of the Palestinian people”¹⁶⁰. Jonathan Schanzer, an expert in Middle East history and the Vice President for Research at the Foundation for

¹⁵³ *Id.*

¹⁵⁴ *Hamas Denies Israeli Claims of Official’s Expulsion from Turkey*, MEMO (7 Aug. 2015), <https://www.middleeastmonitor.com/news/middle-east/20289-hamas-denies-israeli-claims-of-officials-expulsion-from-turkey>.

¹⁵⁵ *Id.*

¹⁵⁶ Sevil Erkus, *Turkey: Hamas Leader Arouri Not in Turkey*, HURRIYAT DAILY NEWS (12 Aug. 2015), <http://www.hurriyetdailynews.com/turkey-hamas-leader-arouri-not-in-turkey-.aspx?pageID=238&nID=86851&NewsCatID=510>.

¹⁵⁷ *Hamas Denies Israeli Claims of Official’s Expulsion from Turkey*, *supra* note 154.

¹⁵⁸ *Id.*

¹⁵⁹ *Qatar, Turkey Take Bold Step for Strategic Cooperation*, HURRIYAT DAILY NEWS (19 Dec. 2014), <http://www.hurriyetdailynews.com/qatar-turkey-take-bold-step-for-strategic-cooperation.aspx?pageID=238&NID=75852&NewsCatID=510>.

¹⁶⁰ *HH the Emir, Turkish President Sign Agreement to Establish Supreme Strategic Committee*, QATAR NEWS AGENCY (19 Dec. 2014), <http://welcomeqatar.com/en/emir-turkish-president-sign-agreement/>.

Defense of Democracies, described the Supreme Strategic Committee with Qatar as Turkey's agreement to "jointly pursue aggressive foreign policies that the two countries have embraced separately for the better part of a decade", adding that " Hamas is undeniably a significant part of that joint agenda"¹⁶¹.

On 27 December 2014, Hamas political bureau chief, Khaled Meshaal, appeared at an AKP assembly in Konya, Turkey¹⁶². Meshaal met with President Erdoğan in Ankara prior to the AKP assembly, but Prime Minister Ahmet Davutoğlu was present at the Konya rally¹⁶³. Meshaal gave a short speech that was frequently interrupted by the chants of Palestinian flag-waving AKP supporters who cried, "Allahu akbar" (God is great), and, "Down with Israel"¹⁶⁴. In his speech, Meshaal praised the people of Turkey "for having Davutoğlu and President Recep Tayyip Erdoğan"¹⁶⁵. Meshaal was also quoted as saying, "A strong Turkey means a strong Jerusalem and a strong Palestine. . . . Inshallah [God willing], we will liberate Jerusalem together. A strong Turkey is a source of power for all Muslims"¹⁶⁶.

For his part, Prime Minister Davutoğlu also gave a speech in which he said, "God is witness . . . we will make this red flag [the Turkish national flag] a symbol of the innocent. This red flag will fly side-by-side with the flags of Palestine, free Syria and all other

¹⁶¹ Jonathan Schanzer & David Andrew Weinberg, *The Turkey-Hamas Nexus*, THE NAT'L INTEREST (16 Jan. 2015), <http://nationalinterest.org/feature/the-turkey-hamas-nexus-12044?page=2>.

¹⁶² Pinar Tremblay, *Meshaal's Visit to Turkey Catches Media Off Guard*, AL-MONITOR (28 Dec. 2014), <http://www.al-monitor.com/pulse/originals/2014/12/turkey-gaza-top-hamas-officials-unannounced-visit.html>.

¹⁶³ *Hamas Leader Mashaal Endorses Turkish Leaders in Surprise Speech*, HURRIYET DAILY NEWS (27 Dec. 2014), <http://www.hurriyetdailynews.com/hamas-leader-mashaal-endorses-turkish-leaders-in-surprise-speech.aspx?PageID=238&NID=76166&NewsCatID=352>.

¹⁶⁴ *Id.*; see also Tremblay, *supra* note 162.

¹⁶⁵ *Hamas Leader Mashaal Endorses Turkish Leaders*, *supra* note 163.

¹⁶⁶ Tremblay, *supra* note 162.

innocents' flags anywhere in the world"¹⁶⁷. Davutoğlu also stated that "Turkey will do whatever needs to be done to protect Jerusalem and the al-Aqsa Mosque"¹⁶⁸.

Then, on 6 January 2015, reports emerged that the Qatari government had deported Hamas leader Khaled Meshaal after allowing him to stay in the country for the past three years¹⁶⁹. The Israeli Foreign Ministry congratulated the Qatari government on the decision and implored the Turkish government to "follow suit"¹⁷⁰. However, most commentators expected Meshaal to simply relocate to Turkey, based on President Erdoğan's past relationship with Meshaal¹⁷¹. Hamas officials denied the claims that Meshaal had been deported¹⁷². A Hamas official named Ezzat al-Rishq was quoted as saying, "There is no truth to what some media outlets have published over the departure of my brother Khaled Meshaal from Doha"¹⁷³. Senior Middle East analysts for the Jerusalem Center of Public Affairs reported that Meshaal has not left Qatar¹⁷⁴.

¹⁶⁷ *Meshaal: Democratic Turkey Means a Strong Palestine*, MA'AN NEWS AGENCY (30 Dec. 2014), <http://www.maannews.net/eng/ViewDetails.aspx?ID=750074>; see also Kellan Howell, *Hamas Leader: Turkey Is a 'Source of Power for All Muslims'*, WASH. TIMES (27 Dec. 2014), <http://www.washingtontimes.com/news/2014/dec/27/hamas-leader-meshaal-turkey-is-a-source-of-power-fl/>.

¹⁶⁸ Burak Bekdil, *Why Hamas Feels So At Home In Turkey*, MIDDLE EAST FORUM (1 Jan. 2015), <http://www.meforum.org/4956/why-hamas-leader-khaled-mashaal-feels-so-at-home>.

¹⁶⁹ Elhanan Miller, *Hamas Leader Mashaal Said Deported from Qatar*, TIMES OF ISRAEL (6 Jan. 2015), <http://www.timesofisrael.com/hamas-leader-mashaal-said-deported-from-qatar/>.

¹⁷⁰ *Id.*

¹⁷¹ *Id.*; see also Report: *Hamas' Mashaal Expelled from Qatar, Heading for Turkey*, TODAY'S ZAMAN (6 Jan. 2015), http://www.todayszaman.com/diplomacy_report-hamas-mashaal-expelled-from-qatar-heading-for-turkey_369063.html.

¹⁷² Robert Tait, *Fate of Exiled Hamas Leader Unclear After Reported Expulsion to Turkey*, TELEGRAPH (6 Jan. 2015), <http://www.telegraph.co.uk/news/worldnews/middleeast/israel/11328804/PICandPUB-Fate-of-exiled-Hamas-leader-unclear-after-reported-expulsion-to-Turkey.html>.

¹⁷³ *Id.*

¹⁷⁴ Paul Alster, *Suspicious of Turkey, Hamas Alliance Stoke Fears in Israel*, FOX NEWS (4 Mar. 2015), <http://www.foxnews.com/world/2015/03/04/turkey-red-carpet-for-hamas-stokes-fears-in-israel/>.

The most noteworthy recent development occurred on 12 January 2015, when Palestinian Authority (PA) President Mahmoud Abbas made an official visit to the presidential palace in Ankara where he met with President Erdoğan¹⁷⁵. The meeting marked the first time that the Turkish president welcomed Abbas according to the official protocols for receiving a Head of State¹⁷⁶. The two officials took pictures in front of an array of Turkish soldiers in historical military uniform, sixteen different uniforms to represent the sixteen empires of Turkish history that “are also symbolized in the sixteen stars of the official seal of the Turkish presidency that has been given a new prominence since Erdoğan moved from the office of the prime minister after August’s presidential elections”¹⁷⁷.

At their private meeting, Erdoğan and Abbas discussed “the repercussions of the failure of the UN Security Council (UNSC) to adopt a draft resolution setting a deadline to end Israel’s occupation of Palestinian territories, issues related to Palestinian statehood and the reconstruction of war-torn Gaza following the Israeli offensive last year”¹⁷⁸. They were also expected to discuss the ties between the two governments and the amount of aid given to Palestine by the Turkish government¹⁷⁹. In Turkey’s 2015 budget, over \$200 million have been allocated to help rebuild the Gaza Strip¹⁸⁰. In addition, the Turkish State-run Turkish International Cooperation and Development Agency (TİKA) began a campaign to build 1,000 homes in Gaza as a part of the rebuilding campaign¹⁸¹.

¹⁷⁵ *Abbas Welcomed at Turkish Presidential Palace by Erdoğan – And 16 Warriors*, GUARDIAN (12 Jan. 2015), <http://www.theguardian.com/world/2015/jan/12/abbas-erdogan-16-warriors-turkish-presidential-palace>.

¹⁷⁶ Sena Alkan, *Abbas Meets Erdogan as Leaders Show Unity to End Israeli Occupation*, DAILY SABAH (13 Jan. 2015), <http://www.dailysabah.com/politics/2015/01/13/abbas-meets-erdogan-as-leaders-show-unity-to-end-israeli-occupation>.

¹⁷⁷ *Abbas Welcomed at Turkish Presidential Palace by Erdoğan*, *supra* note 175.

¹⁷⁸ Alkan, *supra* note 176.

¹⁷⁹ *Id.*

¹⁸⁰ *Id.*

¹⁸¹ *Id.*

These recent events demonstrate that Turkey and the AKP appear to be doubling-down on their policy of backing the Palestinian cause in spite of the harm that this approach causes to Turkish-Israeli relations. Notably, Erdoğan's formal reception of Abbas as a Head of State came after Erdoğan's victory in Turkey's presidential election¹⁸². With his move to the office of president, Erdoğan extended his and the AKP's "12-year grip on power" in Turkey¹⁸³. In his victory speech, Erdoğan said that his rise to the presidency signaled the closing of doors to one era and the "first step to a new phase"¹⁸⁴. If the history of Erdoğan's time in power, not to mention his first actions as president, is a lesson, then this "new phase" will continue the recent trend of decline in Turkish-Israeli relations and rise in Turkish-Palestinian relations.

CONCLUSION

The historical development of relations between Turkey and Israel, including the recent changes wrought by the AKP, show that Turkey's stance regarding Israel is driven by a mix of religious ideology and political expediency. In the early relationship between the two countries, although they experienced periods of stress, they managed to forge a strong relationship based on the mutual military and economic benefits of their relations. However, the rise of Islamist political parties in Turkey, including the NSP and the Welfare and Virtue Parties, directly harmed Turkey's relations with Israel while simultaneously strengthening Turkey's ties with Arab nations and terrorist groups like Hamas. The current party in power, the AKP, is a continuation of Islamist parties that were previously banned, and the AKP's initial promises of reform were misleading, perhaps to reduce

¹⁸² Joe Parkinson & Emre Peker, *Turkey Election: Erdogan Wins Landmark Victory*, WALL ST. J. (11 Aug. 2014), <http://www.wsj.com/articles/turks-cast-votes-in-presidential-election-with-erdogan-primed-for-win-1407658125>.

¹⁸³ *Id.*

¹⁸⁴ *Id.*

the chances of its being removed from power by the Turkish military, a strong defender of Turkey as a secular State. Instead, the AKP has welcomed Hamas with open arms, has donated hundreds of millions of dollars to their cause, and has made a habit of condemning Israel on the geopolitical stage. With Erdoğan's 2014 presidential election victory, he has gained a chance to tighten both his and the AKP's grip on Turkish politics, an outcome that makes the future of Turkish-Israeli relations even more tenuous.