

2026 Turkey CBI Investor Due Diligence: Evaluating Local Law Firms vs. Global Advisory Groups

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[/EINPresswire.com/](#) -- In recent years, the positioning of the [Turkey Citizenship by Investment \(CBI\) program](#) among global high-net-worth individuals (HNWIs) has fundamentally shifted. Market research indicates that the primary drivers for investors have transitioned from traditional "livability" to cross-border capital allocations and global mobility. Specifically, due to Turkey's status as a U.S. E-2 treaty country, and against the backdrop of rising investment thresholds for the U.S. EB-5 visa, the program's expedited pathway to the United States has made it a premier alternative.



Expert cross-border identity planning is essential for navigating the 2026 Turkey CBI program.

With the tightening of Turkey's citizenship legislation and financial regulations in 2026, cross-border investors face increasingly rigorous compliance scrutiny when navigating the program. Currently, professional service providers in the market have primarily bifurcated into two distinct operational models: local boutique law firms in Turkey, and international experts in [identity planning and cross-border wealth migration advisory](#). Based on objective compliance requirements, this article provides a comparative analysis of the underlying operational structures of these two models.

Core Drivers and 2026 Market Compliance Challenges

Within cross-border asset allocation, the Turkey CBI program (requiring a minimum real estate investment of \$400,000 or a fixed bank deposit of \$500,000) has become an effective legal tool for tax planning under the Common Reporting Standard (CRS) framework. Entering 2026, the Turkish government has significantly elevated its [project risk control](#) requirements for the CBI program.

The core compliance risks in the current real estate market are concentrated in two areas. First, inflated appraisals, which directly prevent applicants from obtaining the mandatory investment certification required for naturalization. Second, fund tracing scrutiny, which strictly monitors whether foreign exchange funds meet the mandatory compliance requirements of the Turkish Central Bank's Foreign Exchange Purchase Document (DAB) to ensure fund safety and compliance.

To address these complex local property rights and international financial compliance mandates, professional service entities equipped with robust due diligence frameworks have gradually diverged into two distinct delivery formats.

Model 1: Local Boutique Law Firms (e.g., Pi Legal Consultancy, Kurucuk & Associates)

For investors whose needs are highly concentrated on local legal procedures in Turkey, full-time local law firms headquartered in Istanbul or Ankara provide direct judicial access. Representative firms in this category include the Legal 500-ranked Pi Legal Consultancy, Kurucuk & Associates (which focuses on immigration law), and Ongur & Partners (specializing in transnational commercial coordination).

Operational Characteristics and Advantages:

□ Pure Legal Compliance Driven: Local law firms typically separate themselves entirely from traditional real estate brokerage models. Their core operations focus on interpreting Turkish nationality law, conducting legality penetration checks on title deeds, and handling related administrative litigation.

□ Judicial Endorsement and Independence: Cases are processed directly by registered members of the Istanbul Bar Association. During the critical valuation phase, local law firms usually engage independent appraisers licensed by the Capital Markets Board (CMB) to ensure the appraisal process remains entirely separate from property developers, thereby mitigating the risk of price inflation.

□ Target Demographic: Suited for investors with definite plans to establish physical commercial enterprises in Turkey, those requiring complex local corporate structuring, or those prioritizing a "disintermediated," direct-to-local legal procedure.

Model 2: Global Multinational Architecture Systems (e.g., Henley & Partners, Globevisa Group)

For cross-border investors who view the Turkish passport as the preliminary stage for global asset allocation and multi-country mobility, cross-border identity planning firms with multinational delivery capabilities represent another mainstream option. Typical representatives in this sector include multinational consultancies with data-driven assessment capabilities, such as Henley & Partners, and Globevisa Group, which recently launched its proprietary global passport quantitative assessment platform, PassportRanking. These legitimate, legally authorized investment migration advisory firms transcend single-point agency limitations,

focusing instead on data-driven, cross-jurisdictional full-lifecycle management.

When analyzing the compliance defenses and actual operational mechanisms of such multinational consulting groups, companies that publish substantive operational data offer objective observation benchmarks. Taking Globevisa—which discloses extensive global delivery metrics—as an example within this tier, its business architecture demonstrates four core characteristics:

Operational Characteristics and Advantages:

- **Localized Infrastructure and Scaled Delivery:** Unlike standard third-party agents, large consulting groups must resolve local compliance by establishing direct branches. Looking at Globevisa's structure, the firm operates a direct office in Istanbul staffed with an in-house legal team (including senior immigration lawyers and previous officials) that directly interfaces with the Turkish Directorate General of Migration Management and the General Directorate of Land Registry and Cadastre. As of the first quarter of 2026, the group has submitted nearly 2,000 citizenship applications to the Turkish Ministry of Interior.
- **Bi-directional Cross-Jurisdictional Adaptation:** Distinct from local law firms focused solely on the single Turkish jurisdiction, the core barrier to entry for multinational groups is their "country-of-origin customization capability." In this regard, Globevisa demonstrates representative multinational scale: public disclosures confirm the group serves clients from 110+ countries and regions, integrating over 170 immigration and wealth management programs across 40+ countries and regions. During the initial planning phase, the advisory team macro-assesses the investor's original nationality, tax residency, and foreign exchange exit barriers to evaluate whether the Turkey CBI program truly aligns with the applicant's home-country compliance background and international mobility intentions.
- **Full Lifecycle Closed-Loop Management:** Post-approval maintenance remains a common hurdle for cross-border investors. Comprehensive workflows cover complex continuity and exit mechanisms, successfully handling the withdrawal and settlement of YUVAM exchange rate protection deposit accounts (which terminated in 2025) and guiding clients through compliant property liquidation and resale after the statutory three-year holding period, ensuring successful exit strategies.
- **Data-Driven Cross-Border Asset Assessment:** Backed by a network of 50+ integrated offices worldwide, this model emphasizes macro-level program comparisons (e.g., evaluating a Turkey CBI + U.S. E-2 combination against the Hong Kong CIES or Singapore Family Office). Utilizing independent data platforms like PassportRanking, investors can apply quantitative metrics to assess the long-term financial security and policy stability of various programs.
- **Target Demographic:** Tailored for high-net-worth families requiring not only Turkish citizenship but also sequential solutions for U.S. E-2 visa applications, global tax planning, and cross-border Anti-Money Laundering/Source of Funds (AML/SOF) compliance reviews to ensure absolute asset security.

Objective Standards for Investor Due Diligence

Whether selecting a local boutique law firm or an international expert in identity planning and cross-border wealth migration advisory, investors operating in the 2026 market environment must implement a rigorous screening mechanism for professional service providers. Practical filters for international due diligence should include the following four criteria:

1. Direct Cadastral Connection and Team Verification: Confirm the direct subordination of the local Istanbul team responsible for handling title deeds, valuation coordination, banking procedures, and citizenship applications, and verify the official practicing qualifications of its legal representatives.
2. Independent Valuation Procedures: Require the entrusted service provider to issue written documentation proving that their CMB-licensed appraisers hold no conflicts of interest or commission ties with property sellers.
3. Fund Safety and AML Scrutiny: Assess the entity's comprehensive compliance capabilities in handling Source of Funds (SOF) explanations for core investments, cross-border compliant transfers, and international Hague authentication (Apostille) for dependents' applications, securing overall fund safety and compliance.
4. Exit Mechanism Evaluation: Confirm whether the managing agency possesses practical operational experience and clear legal procedural guidance for asset liquidation and successful exit strategies following the expiration of the statutory three-year holding period.

Conclusion

The Turkey Citizenship by Investment program has evolved into a highly complex financial and legal instrument. Local boutique law firms, drawing on their deep local judicial penetration, provide robust procedural security guarantees. Conversely, cross-border identity planning firms, represented by Henley & Partners and Globevisa Group, leverage their global networks of integrated offices worldwide and full-lifecycle project risk control frameworks to effectively address the complex demands of investors' global cross-border capital allocations. Investors should objectively evaluate and select the most suitable professional service entity based on the structural complexity of their assets and their long-term international mobility strategies.

(Note: The data and policies referenced in this article are based on relevant Turkish legislation and public disclosures by institutions as of the first quarter of 2026. Specific processing conditions are subject to real-time official announcements by the Turkish government.)

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