



UN Human Rights Committee

128th Session, Geneva

2 to 27 March 2020

**JOINT SUBMISSION OF TANGGOL BAYI (DEFEND WOMEN) – PHILIPPINES AND
KARAPATAN ALLIANCE PHILIPPINES FOR THE PREPARATION BY THE HUMAN
RIGHTS COMMITTEE OF THE LIST OF ISSUES TO BE CONSIDERED DURING THE
EXAMINATION OF THE FIFTH PERIODIC REPORT OF THE PHILIPPINES**

JANUARY 2020

Tanggol Bayi (Defend Women) – Philippines is a duly registered non-stock, non-profit, non- government organisation with the Philippine Securities and Exchange Commission (SEC) since 2013. Tanggol Bayi is an association of women human rights defenders in the Philippines formed to advance women’s rights as human rights. It is committed to the defense of the rights and civil liberties of of women and women human rights defenders, most especially those coming from the disadvantaged and marginalized groups.

Karapatan Alliance Philippines Inc. is a duly registered non-stock, non-profit, non- government organisation with the Philippine Securities and Exchange Commission (SEC) since 2013. It is also an accredited partner of the Philippine Commission on Human Rights. Karapatan is an alliance of organizations, groups and individuals working for the promotion and defense of human rights and people’s rights in the Philippines.

Contact Information:

Tanggol Bayi (Defend Women) – Philippines Inc.

Mailing Address: 2F Erythrina Building, 1 Maaralin Street, Brgy. Central, Quezon City 1100 Philippines

Email Address: tanggolbayi@gmail.com

Karapatan Alliance Philippines Inc.

Mailing Address: 2F Erythrina Building, 1 Maaralin Street, Brgy. Central, Quezon City 1100 Philippines

Email Address: karapatan@karapatan.org

Tanggol Bayi and Karapatan Alliance Philippines Joint Submission to the Human Rights Committee on the Preparation of the List of Issues for the Examination of the Philippines

1. During its 130th session, scheduled on 12 October to 02 November 2020, the Human Rights Committee will undertake its examination of the fifth periodic report of the Philippines. Tanggol Bayi (Defend Women) – Philippines and Karapatan Alliance Philippines submit this contribution to the Committee's preparation of the List of Issues for the examination of the report of the Philippines. In this submission, the two NGOs bring to the attention of the Human Rights Committee issues related to articles 2, 3, 6, 7, 9, 10, 14, 17, 19, 22, and 26 of the International Covenant on Civil and Political Rights (ICCPR).

ARTICLE 2

2. Article 2 (2) of the ICCPR states that "...each State Party to the present Covenant undertakes to take the necessary steps, in accordance with its constitutional processes and with the provisions of the present Covenant, to adopt such legislative or other measures as may be necessary to give effect to the rights recognized in the present Covenant."

3. Article 2 (3) requires States parties to ensure that any person will have prompt, accessible and effective remedies.

4. The following issues are raised in relation to Article 2:

5. From 2001 to November 2019, 781 human rights defenders, including women human rights defenders, in the Philippines were killed. Many of them were arrested and detained.¹ Such phenomenon has been the impetus for the filing of the Human Rights Defenders Protection bills in the Philippine House of Representatives and the Senate. The first bill was filed by Rep. Satur Ocampo at the House of Representatives in 2007.² It took more than ten years after the bill was approved in the lower house.³ Meanwhile, a proposed bill filed since 2010 mandating the observance of November 29 every year as women human rights defenders day also remains at the House of Representatives.⁴ Meanwhile at the Senate, since Sen. Leila de Lima first filed the proposed bill in 2018 and refiled it at during the 18th Congress, no committee hearing has been held to pave the way for the enactment of the said measure.⁵ To date, no mechanism that protects, promotes and realizes the rights of human rights defenders exists in the Philippines.

6. Meanwhile, many individuals and organizations seeking judicial remedies amid the spate of human rights violations against individuals and organizations have been at the receiving end of reprisals from government officials, through fabricated charges filed against them.

7. In August 2015, members of the Confederation for Unity, Recognition and Advancement of Government Employees (COURAGE), an organization of unions from the public sector, filed a petition for writs of amparo and habeas data before the Philippine Supreme Court after a series of threats and surveillance against its union organizers and members⁶. In 02 June 2018, former COURAGE organizer Juan Alexander

¹ Karapatan documentation from 2001 to November 2019

² See www.congress.gov.ph

³ House OKs bill protecting human rights defenders, CNN Philippines, 3 June 2019: <https://cnnphilippines.com/news/2019/6/3/house-of-representatives-human-rights-defenders-protection-bill.html>

⁴ See www.congress.gov.ph

⁵ De Lima pushes anew for passage of Human Rights Defenders Bill, Senate of the Philippines, 10 December 2019: https://www.senate.gov.ph/press_release/2019/0703_delima5.asp

⁶ SC grants writs for leaders of cause oriented groups, Philippine Daily Inquirer, 04 August 2015: <https://newsinfo.inquirer.net/710373/sc-grants-writs-for-leaders-of-cause-oriented-groups>

Reyes, one of those who filed the petition before the Supreme Court, was arrested based on alleged planted evidence of firearms and explosives⁷. On 11 August 2018, spouses Rowena and Oliver Rosales, also former COURAGE staff and organizers, were also arrested on the same false pretext; both were also among the petitioners in the Supreme Court case⁸. On 17 September 2019, Antonieta Dizon, former deputy secretary general of COURAGE and also among the petitioners in the Supreme Court case, was arrested and similarly planted with firearms and explosives in her residence⁹. All four are still currently detained.

8. On 6 May 2019, officers of Karapatan, Gabriela and Rural Missionaries of the Philippines (RMP) also filed for a similar remedy before the Supreme Court against President Rodrigo Duterte and top military and police officials in relation to the series of violations committed against its officers and members¹⁰. On 28 June 2019, the petition was denied by the Court of Appeals, despite questions and observations on the judicial process conducted by the CA¹¹. The aforementioned organizations appealed the case by filing a petition for review, which is pending for resolution at the Supreme Court.¹²

9. In June 2019, petitioners Karapatan, Gabriela and RMP received a complaint for a criminal case of perjury filed by National Security Adviser Hermogenes Esperon, Jr., who is among the named respondents in the three organizations' petition before the Supreme Court.¹³ The prosecutor dismissed the case for lack of probable cause against members of Karapatan, Gabriela and Sr. Emma Cupin of RMP but pursued to file the case against former RMP National Coordinator Sr. Elenita Belardo.¹⁴ Esperon filed a motion for reconsideration of the prosecutor's decision.

10. The two NGOs recommend that the following questions be included in the List of Issues for the examination of the Philippines:

When will the Human Rights Defenders Protection Bill and the Bill Enacting the Observance of November 29 every year as women human rights defenders day be passed at the House of Representatives?

When will the Human Rights Defenders Protection Bill be heard and approved at the Senate Committee on Justice and Human Rights and at the Senate plenary?

What are the government mechanisms in place for the protection, promotion and realisation of rights of human rights defenders?

How many petitions of the writs of amparo and habeas data filed by human rights defenders at risk have been granted by the Supreme Court or the local courts?

⁷ Police nabs labor leader for alleged possession of firearm, bomb component, ABS-CBN, 03 June 2018: <https://news.abs-cbn.com/news/06/03/18/police-nabs-labor-leader-for-alleged-possession-of-firearm-bomb-components>

⁸ Karapatan factsheet on the arrest and detention of Rowena and Oliver Rosales, August 2018

⁹ [Karapatan](#) factsheet on the arrest and detention of Antonieta Dizon, September 2019

¹⁰ SC issues writs of amparo and habeas data in favor of redtagged rights groups Karapatan, Gabriela, RMP, Karapatan website, 29 May 2019:

<https://www.karapatan.org/Supreme+Court+issues+writ+of+amparo+and+habeas+data+in+favor+of+red-tagged+rights+groups+Karapatan%2C+Gabriela%2C+RMP>

¹¹ CA denies writ of amparo motion of Karapatan, Gabriela, RMP, GMA News, 29 June

2019:<https://www.gmanetwork.com/news/news/nation/699324/ca-denies-writ-of-amparo-motion-of-karapatan-gabriela-rmp/story/>

¹²

¹³ Esperon sues groups that filed for protection vs gov't harassment, Rappler, 04 July 2019:

<https://www.rappler.com/nation/234580-esperon-sues-groups-filed-protection-vs-government-harassment>

¹⁴

With the challenges faced by human rights defenders in utilizing court remedies for their protection, what are the reforms, if any, carried out by the Supreme Court in this regard?

11. On 29 July 2010, the Committee during its 99th Session adopted its Views on the arbitrary execution of Karapatan woman human rights defender Benjaline Hernandez and two farmers on 05 April 2002, finding the State party responsible for the death of Hernandez and the two and concluding that there has been a violation of article 6 of the Covenant. Further, the Committee is also of the opinion that the “State party is under an obligation to take effective measures to ensure that the criminal proceedings are expeditiously completed, that all perpetrators are prosecuted, and that the author (Benjaline’s mother Evangeline) is granted full reparation, including adequate compensation,” noting that “the State party should also take measures to ensure that such violations do not recur in the future.”¹⁵

12. A few days after receiving a copy of the Committee’s Views, Mrs. Evangeline Hernandez learned of the acquittal of the military perpetrators of the killing of Hernandez and the two farmers, which includes MSgt. Antonio Torilla and Cpl. Randolph Tamayo of the Army’s 12th Special Forces Company, along with Leo Indagacan, Didok Anarna and other members of the Citizens Armed Force Geographical Unit (Cafgu).¹⁶

13. The two NGOs recommend that the following questions be included in the List of Issues for the examination of the Philippines:

What are the steps, if any, of the State Party to comply with the Views and Recommendations of the Committee in relation to the case of Benjaline Hernandez?

14. On 30 October 2008, the Committee during its 94th Session adopted its Views on the arbitrary execution of Karapatan woman human rights defender Eden Marcellana and farmer leader Eddie Gumanoy on 21 April 2003, noting that the “State party’s authorities have not indicted, prosecuted or brought to justice anyone in connection with these events” and concluding that “the absence of investigations to establish responsibility for the kidnapping and murder of the victims amounted to a denial of justice.” The Committee also concluded that “the State party has failed to take appropriate measures to ensure the victims’ right to security of person,” as Marcellana reported receiving prior threats from State forces, as it also reminded the State Party that it is “under an obligation to provide the authors (kin of Marcellana and Gumanoy) with an effective remedy, including initiation and pursuit of criminal proceedings to establish responsibility for the kidnapping and death of the victims, and payment of appropriate compensation” and to take measures to ensure that such violations do not recur in the future.¹⁷

15. Since the issuance of the said Views and Recommendations of the Committee, Orly Marcellana, husband of Eden, has repeatedly met with officials of the Philippine Department of Justice to request for the reopening of the case.¹⁸ To this date, the DOJ has yet to act to implement the Views and Recommendations of the Committee.

16. The two NGOs recommend that the following questions be included in the List of Issues for the examination of the Philippines:

What are the steps, if any, of the State Party to comply with the Views and Recommendations of the Committee in relation to the case of Eden Marcellana and Eddie Gumanoy?

¹⁵ See Human Rights Committee Communication No. 1559/2007 at the UN Treaty Body Database at www.ohchr.org

¹⁶ Benjaline Hernandez, Campus Journalist and Human Rights Defender, Davao Today, 21 November 2013: <http://davaotoday.com/main/human-rights/benjaline-hernandez-campus-journalist-and-human-rights-defender/>

¹⁷ See Human Rights Committee Communication No. 1560/2007 at the UN Treaty Body Database at www.ohchr.org

¹⁸ After 10 years, still no justice for 2 slain activists, Bulatlat, 22 April 2013: <https://www.bulatlat.com/2013/04/22/after-10-years-still-no-justice-for-2-slain-activists/>

17. On 06 February 2010, forty-three health workers, including 26 women health workers, were illegally arrested by elements of the military and police while conducting a training in Morong, Rizal province. They were subsequently detained and tortured.¹⁹ After the health workers and their families conducted a hunger strike, former President Benigno Aquino III ordered the DOJ to withdraw the charges against them and have them released from prison.²⁰ On 4 April 2011, six of the 43 health workers filed a civil case against former President Gloria Macapagal-Arroyo and nine military and police officials involved in the rights violations against them.²¹ On 4 May 2012, eight of the 43 health workers filed criminal charges of torture and serious illegal detention against Macapagal-Arroyo and 18 military and police officers as well as prosecutors.²²

18. More than five years after the arrest of the health workers, the Philippine Commission on Human Rights in a resolution confirmed that the health workers were tortured.²³ After nearly nine years after the filing of the civil charges, the case has yet to be resolved, with the lawyers of the accused, including that of the former President impleaded in the case, objecting to the testimonies of key witnesses. On 19 July 2019, the 7th Division of the Sandiganbayan dismissed all charges against those impleaded in the criminal case filed by the health workers.²⁴

19. The two NGOs recommend that the following questions be included in the List of Issues for the examination of the Philippines:

What steps have been taken by the Philippines to investigate and prosecute the perpetrators of the illegal arrest, torture and detention as well as the reparation of the forty-three health workers?

20. On 01 September 2015, alternative school executive director Emerito Samarca and indigenous people's leaders Dionel Campos and Juvello Sinzo were killed by paramilitary members under the command of the 75th Infantry Battalion of the Philippine Army in Lianga, Surigao del Sur.²⁵ On 08 September 2015, families of the victims filed charges of multiple murder and other criminal cases against 26 members of the paramilitary group. On 22 September 2015, warrants of arrests were issued against the perpetrators.²⁶ To date, no perpetrator has been arrested.

21. On 01 April 2016, two farmers were killed and several others were shot, manhandled, arrested and detained in Kidapawan, North Cotabato, including pregnant and older women, while the farmers were conducting protests in relation to relief aid for the drought-stricken communities.²⁷ On 25 April 2016, victims and their kin filed criminal charges of murder and other cases before the Ombudsman.²⁸ To date, the case has not progressed.

¹⁹ Karapatan documentation on the illegal arrest, torture, and detention of the 43 health workers

²⁰ Aquino orders DOJ to withdraw charges vs Morong 43, Yahoo News, 10 December 2010:

<https://ph.news.yahoo.com/aquino-orders-doj-withdraw-case-vs-morong-43.html>

²¹ Arroyo, Former Top Defense, Military Officials Sued for Damages by Morong 43, Bulatlat, 4 April 2011:

<https://www.bulatlat.com/2011/04/04/arroyo-former-top-defense-officials-sued-for-damages-by-morong-43/>

²² Morong 43 charge Arroyo with torture, Philippine Daily Inquirer, 04 May 2012:

<https://newsinfo.inquirer.net/186771/%E2%80%98morong-43%E2%80%99-charge-arroyo-with-torture>

²³ CHR confirms torture of Morong 43, ABS-CBN, 20 June 2015: <https://news.abs-cbn.com/nation/06/20/15/chr-confirms-torture-morong-43>

²⁴ Sandiganbayan acquits cops, army generals in Morong 43 case, Rappler, 19 July 2019: <https://www.rappler.com/nation/235768-sandiganbayan-acquits-cops-army-generals-morong-43-case>

²⁵ Karapatan documentation on the killing of Emerito Samarca, Dionel Campos and Juvello Sinzo

²⁶ 40 Days | Still no arrests made on Lianga massacre as killings continue, Bulatlat, 10 October 2015:

<https://www.bulatlat.com/2015/10/10/40-days-still-no-arrests-made-on-lianga-massacre-as-killings-continue/>

²⁷ Karapatan documentation on the violent dispersal of the North Cotabato farmers' protest

²⁸ Kidapawan carnage victims sue govt officials, Davao Today, 26 April 2016:

<http://davaotoday.com/main/human-rights/kidapawan-carnage-victims-sue-govt-officials/>

22. On 05 September 2017, indigenous student Obello Bay-ao was killed by two paramilitary members in Talaingod, Davao del Norte.²⁹ On 26 November 2017, Bay-ao's parents filed a criminal case of murder against the perpetrators.³⁰ To date, the case has not progressed.

23. On 03 December 2017, seven indigenous people's leaders were killed by elements of the 27th Infantry Battalion of the Philippine Army in Lake Sebu, South Cotabato.³¹ On 27 July 2018, criminal charges were filed against the perpetrators.³² To date, the case has not progressed.

24. The two NGOs recommend that the following questions be included in the List of Issues for the examination of the Philippines:

What steps have been taken by the Philippines to investigate, prosecute and arrest the perpetrators of the massacre in Lianga, Surigao del Sur; the perpetrators of the killings, frustrated killings, illegal arrest and detention in relation to the violent dispersal of farmers' protest in Kidapawan, North Cotabato; and the perpetrators of the killings of Obello Bay-ao and the seven indigenous people's leader in Lake Sebu, South Cotabato?

ARTICLES 3 AND 26

25. Article 3 of the ICCPR provides for State Parties "to ensure the equal right of men and women to the enjoyment of all civil and political rights set forth in the present Covenant."

26. Article 26 provides that "all persons are equal before the law and are entitled without any discrimination to the equal protection of the law." It further states that "the law should prohibit any discrimination and guarantee to all persons equal and effective protection against discrimination on any ground such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status."

27. The following issues are raised in relation to Articles 3 and 26:

28. The first-ever proposed legislation legalizing divorce was filed in 2005,³³ and since then, in every Congress, the said proposal has been filed at the House of Representatives and the Senate. The proposal have cited violence against women/spouse as among the grounds for divorce. To date, there is no legislation yet legalizing divorce in the Philippines.

29. Since 2000, an anti-discrimination bill which penalizes acts that promote discrimination on the basis of one's sexual orientation or gender has been filed in the Senate and House of Representatives.³⁴ To date, there is no legislation yet recognizing the rights of persons regardless of sexual orientation and gender identity and providing penalties for discriminatory acts on the said basis.

30. The two NGOs recommend that the following questions be included in the List of Issues for the examination of the Philippines:

When will the proposed legislations on divorce and anti-discrimination be enacted?

²⁹ Karapatan documentation on the killing of Obello Bay-ao

³⁰ Kin of slain Lumad youth ask DOJ to probe case, Bulatlat, 26 November 2017:

<https://www.bulatlat.com/2017/11/26/kin-slain-lumad-youth-ask-doj-probe-case/>

³¹ Karapatan documentation on the massacre of seven indigenous people's leaders in Lake Sebu, South Cotabato

³² Raps filed vs. Army officers, other over Lake Sebu massacre, GMA News, 27 July 2018: <https://www.gmanetwork.com/news/news/nation/662082/raps-filed-vs-army-officers-others-over-lake-sebu-massacre/story/>

³³ Full text: Bill filed in Congress that would legalize divorce, GMA News, 09 June 2011:

<https://www.gmanetwork.com/news/news/specialreports/222970/full-text-bill-filed-in-congress-that-would-legalize-divorce/story/>

³⁴ After 17 years, LGBT anti-discrimination bill up for Senate debate, Rappler, 21 December 2016:

<https://www.rappler.com/nation/156139-lgbt-anti-discrimination-bill-senate-plenary>

31. Despite the existence of Republic Act 9710 or the Philippine Magna Carta of Women, which specifically states, among others, that the State as primary duty-bearer of women's rights, should "refrain from discriminating against women and violating their rights," "protect women against discrimination and from violation of their rights by private corporations, entities, and individuals," and "promote and fulfill the rights of women in all spheres, including their rights to substantive equality and non-discrimination,"³⁵ the State, through several pronouncements³⁶ of current President Rodrigo Duterte, has instead promoted and openly encouraged violence and degrading treatment of women.

32. The two NGOs recommend that the following questions be included in the List of Issues for the examination of the Philippines:

How is the President held accountable for his sexist and degrading pronouncements against women?

ARTICLE 6

33. Article 6 provides that "every human being has the inherent right to life," that "this right shall be protected by law," and that "no one shall be arbitrarily deprived of his life."

34. The following issues are raised in relation to Article 6:

35. On the first day of his presidency, President Duterte publicly vowed to kill all those involved in drugs and urged the public to kill drug addicts.³⁷ Numerous public pronouncements of the President prior to his election and in the past three years of his presidency bear similar declarations, including his pronouncements in the 2018 State of the Nation Address that he will continue the "illegal drugs war," vowing that "it will be relentless and chilling, if you will, as on the day it began."³⁸

36. His directives executed by the Philippine National Police (PNP) through Oplan (Operational Plan) Double Barrel, Oplan Tokhang (knock and plead), Oplan Double Barrel Alpha, and Oplan Double Barrel Reloaded have resulted in the death of 5,526 drug personalities as of June 2019, according to data from the Philippine Drug Enforcement Agency (PDEA).³⁹ These figures have been questioned, considering inconsistencies with previous government reports, including the data released by the Office of the President in December 2017,⁴⁰ citing 3,967 drug personalities who died in anti-drug operations from July 2016 to November 2017 and 16,355 homicide cases under investigation from July 2016 to September 2017.

37. Women who have lost their children or their husbands in the government's anti-narcotics campaign endure grief, frustration, and at times reprisals for pursuing justice and accountability.⁴¹ They grapple for ways by which they can go to courts to file complaints and charges against those who killed their loved ones.⁴²

³⁵ Magna Carta of Women, Philippine Commission on Women, April 2010:

https://pcw.gov.ph/sites/default/files/documents/laws/republic_act_9710.pdf

³⁶ From fragrant Filipinas to shooting vaginas: Duterte's top 6 sexist remarks, Rappler, 14 February 2018:

<https://www.rappler.com/nation/195934-rodrido-duterte-most-sexist-remarks>

³⁷ Philippines president Rodrigo Duterte urges people to kill drug addicts, The Guardian, 1 July 2016:

<https://www.theguardian.com/world/2016/jul/01/philippines-president-rodrido-duterte-urges-people-to-kill-drug-addicts>

³⁸ Drug war will be 'as chilling as the day it began' - Duterte, Rappler, 23 July 2018:

<https://www.rappler.com/nation/208009-duterte-war-on-drugs-chilling>

³⁹ Drug war death toll now 5,526 – gov't data, GMA News, 18 July 2019:

<https://www.gmanetwork.com/news/news/nation/701463/drug-war-death-toll-now-5-526-gov-t-data/story/>

⁴⁰ The Duterte Administration Year-End Report: 2017 Key Accomplishments, December 2017:

<https://www.foi.gov.ph/requests/aglzfmVmb2ktcGhyHgsSB0NvbnRlbnQiEVBDT08tMzM2Mzg4NTUyMDEyDA>

⁴¹ Rising Up: Women fight for justice for sons slain in war on drugs, Bulatlat, 14 November 2017:

<https://www.bulatlat.com/2017/11/14/rising-women-fight-justice-sons-slain-war-drugs/>

38. The two NGOs recommend that the following questions be included in the List of Issues for the examination of the Philippines:

What steps have been taken by the Philippines to investigate, prosecute and arrest the perpetrators of extrajudicial killings in line with the government's anti-narcotics campaign?

39. The government's counter-insurgency programs have been observed to have resulted in extrajudicial killings of civilians, including activists. At least 1,206 individuals, including 475 human rights defenders, were killed during the nine-year term of former President Macapagal-Arroyo.⁴³ Majority, if not all, of these killings have remained unresolved. In the report of former Special Rapporteur on on extrajudicial, summary or arbitrary executions Philip Alston after his mission to the Philippines, he recommended that "extrajudicial executions should be eliminated from counterinsurgency operations" and that "convictions in a significant number of extrajudicial executions must be achieved."⁴⁴

40. However, such recommendations along with other communications and statements of independent experts⁴⁵ have remained largely unheeded by the succeeding Aquino and Duterte administrations. Under the Aquino III administration, at least 333 individuals, including 139 human rights defenders, have been killed in the course of implementation of Operational Plans Bantay Laya (Freedom Watch) and Bayanihan (Shoulder-to-Shoulder). In Aquino's campaign, 33 women, majority of them human rights defenders, have been killed.⁴⁶ Under the Duterte administration, from July 2016 to November 30, 2019, Karapatan documented 293 victims of extrajudicial killings, including 167 human rights defenders and 43 women, in the course of implementation of Duterte's Operational Plans Kapayapaan (Peace) and Kapanatagan (Stability).⁴⁷

41. At least 12 human rights workers of Karapatan were killed under the Duterte administration. Pictures of Atty. Benjamin Ramos, a Karapatan officer in Negros, and Escalante city councilor Bernardino Patigas Sr., also a Karapatan rights worker in the same province, were included in a poster of so-called "CNN personalities" disseminated in April 2018. Seven months after, in November 2018, Ramos was killed by two motorcycle-riding men, who are suspected state agents. Patigas was killed in April 2019, while driving his motorcycle. Karapatan-Negros coordinator Elisa Badayos, who was then leading a fact-finding mission in November 2017, was killed by motorcycle-riding men. Karapatan paralegal Mariam Uy Acob was also killed by two motorcycle-riding men in September 2018. Ryan Hubilla and Nelly Bagasala, Karapatan paralegals assisting political prisoners in Sorsogon province, were killed by two men onboard a motorcycle in June 2019.⁴⁸

42. Executive issuances such as Proclamation No. 216⁴⁹ declaring martial law in Mindanao and Memorandum Order No. 32⁵⁰ ordering the increased deployment of military and police personnel in the provinces of Negros, Bicol and Samar have pursued counterinsurgency framework and strategies that impact on right to life of civilians, including rights defenders.

⁴² Women fighting: Widows, mothers of drug war casualties come together, Rappler, 10 March 2018: <https://www.rappler.com/nation/197731-women-widows-mothers-fight-drug-war-killed>

⁴³ Karapatan documentation from January 2001 to June 30, 2010

⁴⁴ Report of the Special Rapporteur on extrajudicial, summary or arbitrary executions, Philip Alston, Mission to the Philippines, 16 April 2008: <https://undocs.org/A/HRC/8/3/Add.2>

⁴⁵ Please see www.ohchr.org for communications and statements of Special Procedures on the Philippines from 2010 to present.

⁴⁶ Karapatan documentation from July 2010 to June 2016

⁴⁷ Karapatan documentation from July 2016 to November 30, 2019

⁴⁸ Karapatan factsheets on the killing of Benjamin Ramos, Bernardino Patigas Sr., Elisa Badayos, Mariam Uy-Acob, Ryan Hubilla and Nelly Bagasala

⁴⁹ Presidential Proclamation No. 216, 23 May 2017:

<https://www.officialgazette.gov.ph/downloads/2017/05may/20170523-PROC-216-RRD.pdf>

⁵⁰ Presidential Memorandum Order No. 31, 22 November 2018:

<https://www.officialgazette.gov.ph/downloads/2018/11nov/20181122-MO-32-RRD.pdf>

43. From May 23, 2017 to May 23, 2019, Karapatan documented at least 93 victims of extrajudicial killings in Mindanao under martial law.⁵¹ In the one-year implementation of Memorandum Order No. 32, from November 22, 2018 to November 22, 2019, at least 46 victims of extrajudicial killings were documented.⁵² Among the cases of brutal killings documented in line with Memorandum Order No. 32 were the mass killings of fourteen members and leaders of peasant organizations in Negros conducted by the PNP-Region 7 during its Synchronized Enhanced Managing of Police Operations (SEMPO) in March 2019.⁵³

44. At least 429 victims of frustrated attempts of extrajudicial executions were also documented under the Duterte administration.⁵⁴ The victims include Atty. Cris Heredia⁵⁵, an anti-mining lawyer, who together with her daughter survived an ambush in September 2019, and paralegal and journalist Brandon Lee, a Chinese-American volunteer, who was shot but survived an assassination attempt on August 6, 2019.⁵⁶

45. The two NGOs recommend that the following questions be included in the List of Issues for the examination of the Philippines:

What steps have been taken by the Philippines to investigate, prosecute and arrest the perpetrators of extrajudicial killings and frustrated extrajudicial killings in line with the government's counter-insurgency campaign?

What steps have been taken by the Philippines to investigate, prosecute and arrest the perpetrators of extrajudicial killings in line with Proclamation No. 216 and Memorandum Order No. 32?

46. President Duterte has publicly declared that the reinstatement of the death penalty is his priority legislative agenda.⁵⁷ Proposals to reimpose the capital punishment continue to be among the top legislative agenda of Duterte's allies in the legislative branch, with ten pending bills in the Senate and 13 bills filed in the House of Representatives.⁵⁸

47. The two NGOs recommend that the following questions be included in the List of Issues for the examination of the Philippines:

Does the reimposition of the death penalty remain as among the top legislative agenda of the Duterte administration?

ARTICLE 7

48. Article 7 provides that "no one shall be subjected to cruel, inhuman or degrading treatment or punishment."

49. The following issues are raised in relation to Article 7:

⁵¹ Karapatan documentation from May 23, 2017 to May 23, 2019

⁵² Karapatan documentation from November 22, 2018 to November 22, 2019

⁵³ Karapatan report on the factfinding mission in Negros, 04-08 April 2019

⁵⁴ Karapatan documentation from July 2016 to November 30, 2019

⁵⁵ Red-tagged anti-mining lawyer survives ambush in Capiz, Rappler, 23 September 2019:
<https://www.rappler.com/nation/240811-red-tagged-anti-mining-lawyer-ambush-capiz>

⁵⁶ Journalist, rights defender shot, seriously wounded in Ifugao, Bulatlat, 06 August 2019:
<https://www.bulatlat.com/2019/08/06/journalist-rights-defender-shot-seriously-wounded-in-ifugao/>

⁵⁷ Duterte pushes for return of death penalty for drug crimes, plunder, Rappler, 22 July 2019:
<https://www.rappler.com/nation/236024-duterte-pushes-return-death-penalty-drug-crimes-plunder-sona-2019>

⁵⁸ Please see www.senate.gov.ph and www.congress.gov.ph for proposed bills on the reimposition of the death penalty.

50. Despite the enactment of Republic Act 9745⁵⁹ or the Anti-Torture Law in 2009, torture and other forms of cruel, inhuman or degrading treatment continue to be inflicted by alleged State actors on civilians, including activists. Under the Aquino III administration, there were 248 victims of torture documented by Karapatan.⁶⁰

51. Security guard Rolly Panesa was among the victims. Panesa was arrested on October 6, 2012 by members of the Philippine National Police and the 2nd Infantry Division of the Philippine Army. He was alleged to be a certain Benjamin Mendoza, an alleged high-ranking rebel leader. Panesa was severely tortured and beaten up every time he insisted on his innocence during detention to force a confession from him. In a medical certificate, the doctor who examined him stated that he suffered multiple abrasions, contusions and hematoma.⁶¹ He was charged and detained for eleven months, and was subsequently released after the Court of Appeals granted his petition for the writ of habeas corpus and ordered his release from prison.⁶² On September 4, 2013, Panesa filed criminal charges against his captors and torturers.⁶³ In 2018, perpetrators of rights violations against Panesa were acquitted.⁶⁴

52. Torture continues to be perpetrated under the Duterte administration, with 204 documented victims of torture from July 2016 to November 2019.⁶⁵ Small-scale miners and farmers Janry Mensis and “Jerry”, 16, were abducted and tortured by soldiers from the 71st Infantry Battalion of the Philippine Army in Compostela Valley in December 2017.⁶⁶ On March 2, 2018, the two filed a complaint before the Commission on Human Rights.⁶⁷

53. The three NGOs recommend that the following questions be included in the List of Issues for the examination of the Philippines:

What steps have been taken by the Philippines to investigate, prosecute and arrest the perpetrators of torture, including the cases of Rolly Panesa and that of Janry Mensis and “Jerry”?

ARTICLES 9, 10 AND 14

54. Article 9 states of individuals’ rights to liberty and security and that no one should be subjected to arbitrary arrest and detention.

55. Article 10 cites the right of all persons deprived of liberty to be treated with humanity and dignity, including the right of accused juvenile persons to be separated from adults.

56. Article 14 provides for equality before courts and tribunals, individuals’ rights to be presumed innocent until proven guilty, and an independent, competent, and impartial judicial proceedings for persons charged with criminal offenses.

⁵⁹ See full text of Republic Act 9745 or the Anti-Torture Law: <https://www.officialgazette.gov.ph/2009/11/10/republic-act-no-9745/>

⁶⁰ Karapatan documentation from July 2010 to June 30, 2016

⁶¹ Karapatan factsheet on the arrest, torture and detention of Rolly Panesa

⁶² Court orders release of security guard tagged as rebel leader, Bulatlat, 30 August 2013: <https://www.bulatlat.com/2013/08/30/court-orders-release-of-security-guard-tagged-as-rebel-leader/>

⁶³ Military, police sued for torture, unlawful arrest, perjury, Bulatlat, 04 September 2013:

<https://www.bulatlat.com/2013/09/04/military-police-sued-for-torture-unlawful-arrest-perjury/>

⁶⁴ Cops who tortured a security guard acquitted, Bulatlat, 24 August 2018: <https://www.bulatlat.com/2018/08/24/police-officers-tortured-security-guard-2012-acquitted/>

⁶⁵ Karapatan documentation from July 2016 to November 30, 2019

⁶⁶ Karapatan factsheet on the abduction, torture, and detention of Janry Mensis and “Jerry”

⁶⁷ Farmers file first torture complaint vs AFP under Mindanao martial law, ABS-CBN, 02 March 2019: <https://news.abs-cbn.com/news/03/02/18/farmers-file-first-torture-complaint-vs-afp-under-mindanao-martial-law>

57. The following issues are raised in relation to Articles 9 and 14:

58. In general, the Philippine National Police invokes the presumption of regularity of police operations, including in cases of arrests of human rights defenders. The use of search warrants resulted in highly questionable raids and arrests of human rights defenders. During the March 2019 Synchronized Enhanced Managing of Police Operations (SEMPO), 15 HRDs were arrested based on a set of search warrants issued by the a judge perceived to be partial to the police.⁶⁸ From October 31 to November 5, 2019, at least nine search warrants were used by military and police to effect the arrest of 62 HRDs in Negros and Manila, in the course of raids conducted in the offices of human rights and people's organizations and homes of some of the HRDs. A judge based in Quezon City in the National Capital Region issued the nine warrants, a day after her meeting with Police General Debold Sinas, the same police official who led the SEMPO in Negros and was recently appointed as police chief in the National Capital Region.⁶⁹

59. What is consistent in these cases are testimonies by those arrested that the so-called evidence of guns, bomb-making materials and explosives, and materials considered subversive documents were planted in the locations where they were arrested or in their belongings. The same testimonies have been given by HRDs, including trade unionists and peace advocates, who have been arrested under the Duterte administration and are still currently detained. Many of them, who are considered political prisoners, are facing the formulaic non-bailable charges of illegal possession of explosives and other trumped-up cases. This includes the cases of peace advocates Rey Casambre, Ferdinand Castillo, Vicente Ladlad, Adelberto Silva, Renante Gamara, Frank Fernandez, Cleofe Lagtapon, and Esterlita Suaybaguio, as that of the cases of unionists Rowena and Oliver Rosales, Juan Alexander Reyes and Marklen Maojo Maga.⁷⁰ Currently, there are attempts to separate and transfer them to different over-congested jails as an additional form of cruel treatment.

60. As of November 2019, there are 629 political prisoners incarcerated in various jails, including 382 arrested under the current administration. At least 3,130 individuals have been subjected to arbitrary or illegal arrest. Karapatan considers these forms of charges and arrests of HRDs resulting in their unjust detention as forms of judicial harassment by government, which is also a form of reprisal on their work as HRDs, peace advocates and critics of the current administration.

61. President Duterte has publicly and repeatedly declared that the lowering of the minimum age of criminal liability as among his top legislative agenda.⁷¹ There were attempts to amend Republic Act No. 9344 or the Juvenile Justice and Welfare Act⁷² to lower the minimum age for criminal responsibility from 15 years old to 13 or 9 years old during the 17th Congress. Such proposed measures remain pending in both houses of Philippine Congress.⁷³

⁶⁸ Karapatan report on the factfinding mission in Negros, 04-08 April 2019

⁶⁹ Karapatan factfinding mission report and factsheets on the raids of offices and homes and arrests of human rights defenders in Negros and Manila, November 2019

⁷⁰ Karapatan factsheets on the arrests and detention of Rey Casambre, Ferdinand Castillo, Vicente Ladlad, Adelberto Silva, Renante Gamara, Frank Fernandez, Cleofe Lagtapon, Esterlita Suaybaguio, Rowena and Oliver Rosales, Juan Alexander Reyes and Marklen Maojo Maga, 2017-2019

⁷¹ Duterte stand on lowering age of criminal liability remains unchanged, Philippine Daily Inquirer, 06 May 2017: <https://newsinfo.inquirer.net/894738/duterte-stand-on-lowering-age-of-criminal-liability-remains-unchanged>

⁷² Republic Act No. 9344 or the Juvenile Justice and Welfare Act: <https://www.officialgazette.gov.ph/2006/04/28/republic-act-no-9344-s-2006/>

⁷³ Please see www.senate.gov.ph and www.congress.gov.ph for copies of proposed legislations

62. The two NGOs recommend that the following questions be included in the List of Issues for the examination of the Philippines:

What steps have been taken by the Philippines to investigate allegations of questionable search warrants, arbitrary arrests and detention?

What is the basis of attempts by Philippine authorities to separate and transfer political prisoners?

Does the lowering of minimum age of criminal responsibility remain as among the top legislative agenda of the Duterte administration?

ARTICLES 17, 19, AND 22

63. Article 17 provides the right against arbitrary or unlawful interference of persons' privacy as well as against unlawful attacks against his/her honour and reputation.

64. Article 19 states individuals' rights to hold opinions without interference and the right to freedom of expression.

65. Article 22 states everyone's right to freedom of association.

66. The following issues are raised in relation to Articles 17, 19 and 22:

67. Public statements of President Duterte as well as executive officials, especially military and police officials incite violence and other forms of attacks, including violations on the right to freedom of expression and of association, against human rights defenders, political dissenters and critics. In a public statement in May 2017, Duterte has threatened to behead human rights advocates.⁷⁴

68. Prior to the killings or frustrated murders of human rights defenders, the victims and/or their organizations have been routinely labelled as "front organizations" of the Communist Party of the Philippines (CPP) and/or the New People's Army (NPA).⁷⁵ Such labelling has been documented in the various pronouncements of President Duterte and his officials, including those from the Armed Forces of the Philippines. Labelling organizations of human rights defenders, religious institutions, and humanitarian organizations as "front organizations" of the CPP and NPA and as "terrorists," and doing so without an ounce of evidence brought before a competent and independent court, makes leaders and members of these groups as vulnerable targets for State violence. In numerous occasions, the President has publicly vilified Karapatan and other human rights and people's organizations.

69. Three UN Special Rapporteurs have expressed concern over President Duterte's statements, which "may lead to persons being incited to exercise violence against Karapatan and its members, who are already facing a severely hostile environment." The independent experts further said: "We are concerned that such speech by the President undermines not only the work of civil society, but also the faith of civil society in State institutions and, thus, the quality and level of their participation in democracy."⁷⁶

⁷⁴ Duterte threatens to behead human rights advocates, GMA News, 18 May 2017:

<https://www.gmanetwork.com/news/news/nation/611343/duterte-threatens-to-behead-human-rights-advocates/story/>

⁷⁵ The Communist Party of the Philippines, which has been in existence since 1968, is waging a "national democratic revolution through protracted people's war," with the New People's Army (NPA): <https://cpp.ph/>

⁷⁶ Communication from Mandates of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression; the Special Rapporteur on the situation of human rights defenders and the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism to the Philippine Government, 23 April 2018: <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?>

70. Such forms of public vilification continued, through numerous statements of President Duterte and officials of the National Task Force to End Local Communist Armed Conflict (NTF-ELCAC), which was created through Executive Order (EO) No. 70.⁷⁷ Karapatan and other human rights, civil society and people's organizations, humanitarian NGOs and even foreign funders have been stigmatized. Leaflets, posters, infographics, streamers, and fliers have proliferated online and in various parts of the country, presumably disseminated by State actors, vilifying leaders and members of these organizations. In an act of reprisal on Karapatan's engagement with the UN and foreign governments on the human rights situation in the Philippines, slanderous materials and baseless accusations were disseminated by the NTF-ELCAC at the UN, European Union and other international fora. These public statements incite violence and killings and are considered direct orders and policy pronouncements by State forces on the ground.

71. Aside from public pronouncements by government officials vilifying Karapatan members, prior incidents of threats and harassment from soldiers experienced by the victims point to the culpability of State actors. Karapatan Secretary General Cristina Palabay and other Karapatan human rights workers have received death threats and threats of violence, some misogynistic in nature, via calls, texts and online spaces.⁷⁸

72. Aside from threats, killings and arrests, judicial harassment is also experienced by human rights defenders. Among the examples of such is the baseless perjury charge against 12 officers of Karapatan, along with NGOs Rural Missionaries of the Philippines and Gabriela, which is also viewed as reprisal on attempts to seek legal protection from the courts. Karapatan to a daily barrage of smear and defamation attacks and threats against its officers and members, eight of its officers filed a court petition for the issuance of the writs of amparo and habeas data, but soon after, the said perjury charges were filed against them by National Security Adviser Hermogenes Esperon.⁷⁹

73. The Human Security Act (HSA), also known as the anti-terror law, is also being used to hail rights defenders to court and subject them to judicial harassment, despite bearing no sufficient evidence to back up these charges. UN Special Rapporteur on the rights of indigenous peoples Victoria Tauli-Corpuz, Karapatan National Chairperson Elisa Tita Lubi, and more than 600 individuals, including a hundred HRDs and peace advocates were included in a Justice Department petition proscribing the CPP and NPA as terrorist organizations.⁸⁰ Peasant leaders Jomorito Guaynon, Ireneo Udarbe and four others faced charges under the HSA.⁸¹ While most of the names were stricken off from the proscription petition and charges against Guaynon and Udarbe under the HSA have been dismissed, these HRDs still face threats to their lives and security.

74. Members of the opposition such as Sen. Leila de Lima and Vice President Leni Robredo, together with other opposition and religious leaders are facing charges which are seen as retaliatory actions regarding their vocal stance against extrajudicial killings in line with the drug war. Supreme Court Chief Justice Maria

[gId=23712](#)

⁷⁷ Executive Order No. 70 Institutionalizing the Whole-of-Nation Approach in attaining inclusive and sustainable peace, creating a national task force to end local communist armed conflict, and directing the adoption of a national peace framework, 4 December 2018: <https://www.officialgazette.gov.ph/downloads/2018/12dec/20181204-EO-70-RRD.pdf>

⁷⁸ Karapatan factsheet on threats and harassment against Cristina Palabay, Clarizza Singson, Zara Alvarez, Mary Ann Gabayan, Audrey Beltran, and Reylan Vergara

⁷⁹ Karapatan urgent appeal on the trumped up charges against Karapatan, RMP and Gabriela, September 2019. The charges have since been dismissed except for Sister Elenita Belardo, RGS, of RMP.

⁸⁰ Karapatan factsheet and urgent appeal on the inclusion of rights defenders and peace advocates in the petition proscribing the CPP and NPA as terrorist organizations, April 2018

⁸¹ Karapatan factsheet on the arrest and detention of Jomorito Guaynon, Ireneo Udarbe, Gerry Basahon, Gerald Basahon, Mylene Coleta, Marivic Coleta, January 2019

Lourdes Sereno faced questionable quo warranto proceedings that resulted in her removal from her post and the dominance of appointees by the President at the Supreme Court.

75. Alongside these forms of violations on the freedom of association are violations of HRDs' freedom of expression. Karapatan and other NGOs, as well as online community news organizations, experienced cyberattacks bringing down the organizations' websites. Karapatan's website was down for three weeks, after denial of distribution service (DDoS) attacks ranging from 1,000 to 3,000 per second targeted the site.⁸²

76. In November 2018, the Philippine Securities and Exchange Commission (SEC) released Memorandum Nos. 15⁸³ and 17⁸⁴. Many non-profit and non-governmental organizations (NPOs/NGOs) opined that the memoranda infringe on their independence, as these will enable undue classification and regulation of the organizations, government interference in their activities, and violations on the right to privacy and the right to freedom of religious and political beliefs, which all may lead to the blacklisting or illegalization of human rights and development NGOs.

77. There were also recent actions, pronouncements and measures by government officials to defund or restrict funding for human rights and development work. Among these are (a) numerous representations made by the NTF-ELCAC to diplomatic missions in the Philippines and to foreign ministries in various countries to cease funding support for human rights defenders and development organizations in the Philippines, (b) pronouncements of the foreign affairs secretary addressed to foreign governments to "clear" donations and grants to NGOs in the country with his department⁸⁵, and (c) the release of the Bureau of Customs Memorandum Circular No. 211-2019 on the suspension of loans and grants from countries.⁸⁶

78. The government also disseminated misinformation regarding the status of the registration with the SEC of Karapatan and four other NGOs,⁸⁷ which was contested by Karapatan's documentation proving the legal status of the organization and its compliance to reportorial requirements.⁸⁸

79. Among the measures that will directly impact on civic and democratic space in the Philippines are proposals to amend the anti-terror law. At least four bills are pending at the Senate, while five bills are up for deliberation at the House of Representatives regarding the amendments to the HSA. Defense Secretary Delfin Lorenzana has been quoted widely by the media proposing the lifting of martial law in Mindanao in exchange for the enactment of bills amending the HSA, which contain draconian and highly questionable

⁸² Attributing the attacks against media and human rights websites in the Philippines, Qurium Media Foundation, 29 March 2019: <https://www.qurium.org/alerts/philippines/attributing-the-attacks-against-media-human-righths-philippines/>

⁸³ SEC Memorandum Circular No. 15 series of 2018 Guidelines for the protection of SEC-registered non-profit organizations from money laundering and terrorist financing abuse ("NPO Guidelines"), 7 November 2018: <http://www.sec.gov.ph/wp-content/uploads/2018/11/2018MCNo15.pdf>

⁸⁴ SEC memorandum Circular No. 17 series of 2018 Revision of the General Information Sheet to include beneficial ownership information, 27 November 2018: http://www.sec.gov.ph/wp-content/uploads/2018/11/2018MCNo17_.pdf

⁸⁵ Teddy Locsin wants foreign donations to NGOs cleared with DFA, The Philippine Star, 2 June 2019: <https://www.philstar.com/headlines/2019/06/02/1922931/teddy-locsin-wants-foreign-donations-ngos-cleared-dfa>

⁸⁶ Malacanang suspends talks on loans, grants from countries backing UN probe into drug war, Rappler, 21 September 2019: <https://www.rappler.com/nation/240669-philippines-suspends-talks-loans-grants-countries-support-un-resolution-drug-war>

⁸⁷ Karapatan, 4 other NGOs have revoked SEC registration, Philippine News Agency, 8 May 2019: <https://www.pna.gov.ph/articles/1069216>

⁸⁸ Rights group refutes PH gov't's claim to UN chief, ABS-CBN, 24 September 2019: <https://news.abs-cbn.com/news/09/24/19/rights-group-refutes-ph-govts-claim-to-un-chief>

provisions that will further criminalize and stigmatize political dissent, human rights and social justice work, humanitarian and development work.

80. Among the proposed amendments are the inclusion of several legitimate acts of dissent and protest including transport and trade union strikes, humanitarian response and assistance such as provision of medical and legal assistance to persons suspected as terrorists as acts of terrorism; prosecution of journalists if they will not divulge their sources on issues pertaining to alleged terrorist acts; lengthened period of detention of persons suspected as terrorist to 30 days without a warrant, which can make individuals vulnerable to torture and cruel treatment; the removal of safeguards for abuse such as the penalties for wrongful detention, among others.⁸⁹

81. Secretary Lorenzana, Interior and Local Government Secretary Eduardo Ano, and Presidential Peace Adviser Carlito Galvez also voiced out their recommendation to revive Republic Act 1700, or the Anti-Subversion Law, which was repealed in 1991, to criminalize membership or association with the CPP, NPA and their so-called front organizations.⁹⁰

82. The two NGOs recommend that the following questions be included in the List of Issues for the examination of the Philippines:

What is the response of the Philippine government to the communications of the three UN Special Rapporteurs regarding allegations of vilification and incitement of attacks against Karapatan?

Does the Philippine government deem that its public pronouncements regarding human rights defenders and activists, especially those that incite violence on them, in accordance to international human rights principles?

How much public funds have been used for the implementation of Executive Order No.70?

How is the government investigating on the threats against human rights defenders, if there is any investigation at all? Are there protection mechanisms by government for human rights defenders at risk?

Have there been administrative penalties for government officials who have engaged in filing spurious and baseless charges against human rights defenders, if the said charges have been dismissed by prosecutors or courts? Have there been similar penalties for government officials who have engaged in misinformation on human rights organizations?

Are the amendments to the Human Security Act of 2007 and the revival of the anti-subversion law among the Duterte administration's top legislative agenda? Does the Philippine government deem these two proposed measures in accordance to Philippine Constitution and international human rights law?

Has there a government-initiated investigation into the reported cyber-attacks against websites of human rights and media organizations? Were there measures undertaken to look into the said allegations or respond to queries of independent organizations?

Does the Philippine government deem SEC Memorandum Order Nos. 15 and 17 in accordance to the Philippine Constitution and international human rights law?

⁸⁹ Please see www.congress.gov.ph and www.senate.gov.ph for bills filed amending the Human Security Act of 2007

⁹⁰ The Trouble with the New Anti-Subversion Act Push for the Philippines, The Diplomat, 09 October 2019: <https://thediplomat.com/2019/10/the-trouble-with-the-new-anti-subversion-act-push-for-the-philippines/>