

Lawyers for Lawyers

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Introduction / General analysis:

In many states of the world, the activities of human rights lawyers are considered as threats to the power of a state in general, certain institutions, groups or individuals. In practice, in most cases these appear to be state authorities, e.g. the armed forces, police forces and sometimes even their own bar associations. In this respect, the lawyers remind these entities of the concept of the rule of law. Since in many states this concept endangers established interests, lawyers have been and still are victims of threats, harassments, attacks, arrests and even killings. These impediments constitute clear violations of various international human rights conventions (most notably the International Convention on Civil and Political Rights, 1966) and also of the *Basic Principles on the Role of Lawyers*, as Adopted by the Eighth United Nations Congress on the Prevention of Crime and the Treatment of Offenders, Havana, Cuba, 27 August to 7 September 1990.

In this context, some general remarks can be made with respect to the cases **Lawyers for Lawyers** has come across during the past six years.

1. 'Interference' by lawyers seems to be less tolerated by authorities in politically sensitive cases. Examples are cases concerning victims of the conflict in Chechnya and the Khodorkovsky Case in the Russian Federation, the defense of Tibetan monks in China, and publications about human rights violations in countries like Tunisia, Sudan and Lebanon.
2. A distinction can be drawn between state authorities that themselves are engaged in acts of oppression on the one hand, and, on the other hand, the failure to take appropriate measures if such acts occur on the territory of the state. Although state authorities may refrain from threatening lawyers themselves, they still may very well contribute to an atmosphere that is hostile to lawyers when they fail to start proper investigations in order to punish the perpetrators. After two Mexican lawyers, Piñon and Arellanes, received threats, the Mexican authorities failed to start an investigation.
3. Pressure from the international community seems to matter. States appear to be more reluctant to obstruct lawyers when the eyes of the international community are upon them. However, this is no guarantee to non-interference. In December 2008, the law office of Shirin Ebadi, a Nobel Prize Winner, was closed by the Iranian authorities. Moreover, the Iranian lawyer Baghi was not allowed to leave his country to receive an international human rights award.
4. There does not seem to be a general pattern in the use of various instruments of oppression against lawyers. It depends on the political reality and the factual circumstances what instruments actually are used to defend established interests. China, for example, has, among

other instruments, used the annual procedure for license renewal for political purposes, in particular with respect to the approaching Olympic Games. In Pakistan, the declaration of the state of emergency provided president Musharraf with a pretext to detain political opponents. In quantitative terms, nevertheless, arrests, threats and acts of harassment are the instruments that are most commonly used by state authorities.

5. On several occasions, Bar Associations have been mobilized by state authorities in their oppression of individual lawyers. These organizations may take disciplinary measures. For this reason, a lack of independence of Bar Associations is a direct threat to lawyers in various countries. An example in this category is Muhamad Mugarby, a prominent Lebanese human rights lawyer, who has been thwarted by the Beirut Bar Association for many years.
6. In other cases, lawyers have been confronted with criminal charges in an attempt to curb their activities. Most commonly used charges are the spread of anti-government propaganda and/or involvement in subversive activities (see for example the cases of Nguyen Van Dai, Le Cong Dinh and Le Thi Cong Nhan in Vietnam; the case of Hu Jia in China; the case of Harrison Nkomo in Zimbabwe; the case of Muhamad Mugarby in Lebanon). A human rights organization in Zimbabwe, of which lawyer Arnold Tsunga is member, has been accused of helping foreign countries to restore colonial rule. As a result, lawyers have become subject to criminal proceedings.
7. In some cases, charges against lawyers clearly have been fabricated. Vietnamese lawyer Le Tran Luat, for example, was charged with forgery of documents and fraud; Philippine lawyer Saladero was charged with multiple murder and arson.
8. In most cases, (entities linked to) state authorities are the main perpetrators of acts of oppression against lawyers, most notably police, armed forces and security forces. In some cases, however, perpetrators may not be found within the state apparatus. In Honduras, for example, lawyer Dionisio Díaz García was killed, probably in relation to his investigation of the treatment of former employees by private security firms. The perpetrators were connected to these firms. They were sentenced to 21 years imprisonment on March 18, 2009.
9. Obviously, the worst form of oppression of human rights lawyers is the extrajudicial killing of those lawyers who provide legal assistance to those who are, one way or another, the opposing party to established powers. This form has occurred in the Russian Federation and – on an unprecedented large scale – in the Philippines.

Below, we provide an overview of all the cases which we have come across during the last six years.

Category	Country	Name	Period	Summary of the case
Threats	Mexico	Samuel Alfonso Castellano Piñon	11/2003	On November 24, 2003, Samuel Alfonso Castellano Piñon and Beatriz Casas Arellanes received a letter with death threats. Both work for a christian organization dedicated to the abolition of torture practices in Mexican prisons. Moreover, Piñon and Arellanes work for a regional human rights organization. Since October 2003, they have received threats. At that moment, they were appointed legal counsel to persons who were suspected of killing 26 indigenous people. The incident led to massive commotion. The Mexican authorities are said to have arrested persons arbitrarily, put under pressure by popular verdict. The letters have explicitly referred to this case, asking both lawyers to withdraw. The Mexican authorities have failed to investigate the threats.
Threats	Mexico	Beatriz Casas Arellanes	11/2003	On November 24, 2003, Samuel Alfonso Castellano Piñon and Beatriz Casas Arellanes received a letter with death threats. Both work for a christian organization dedicated to the abolition of torture practices in Mexican prisons. Moreover, Piñon and Arellanes work for a regional human rights organization. Since October 2003, they have received threats. At that moment, they were appointed legal counsel to persons who were suspected of killing 26 indigenous people. The incident led to massive commotion. The Mexican authorities are said to have arrested persons arbitrarily, put under pressure by popular verdict. The letters have explicitly referred to this case, asking both lawyers to withdraw. The Mexican authorities have failed to investigate the threats.
Arrest	Nepal	Basidev Sigdel	01/2004	In January 2004, Nepalese lawyer Basidev Sigdel has been abducted by national security forces. His place of and reasons for detention remained unclear. Human rights organizations have noticed a deteriorating human rights situation in the country since a cease-fire between the armed forces and the Maoist rebellion movement ended in August 2003.

Arrest	Nepal	Gopi Bahadur Bhandari	01/2004	In January 2004, Nepalese lawyer Gopi Bahadur Bhandari has been abducted by national security forces. His place of and reasons for detention remained unclear. Human rights organizations have noticed a deteriorating human rights situation in the country since a cease-fire between the armed forces and the Maoist rebellion movement ended in August 2003.
Arrest	Nepal	Krishna Silwal	01/2004	In January 2004, Nepalese lawyer Krishna Silwal has been abducted by national security forces. His place of and reasons for detention remained unclear. Human rights organizations have noticed a deteriorating human rights situation in the country since a cease-fire between the armed forces and the Maoist rebellion movement ended in August 2003.
Suspension/ harassment	Lebanon	Muhammad Mugarby	02/2004	Two lawyers who were representing Muhammad Mugarby, a prominent human rights lawyer, were suspended on the basis of dubious, unpublished rules of the Bar Association. As a result, they were not able to defend Mugarby during an appeal to his disbarment. Even after the suspension period had ended on December 31, 2003, they experienced harassments. Mugarby has defended himself in court, although he did not have proper access to all relevant documents. Moreover, the independence of the judges is debatable.
Arrest	Syria	Aktam Nu'aysa	04/2004	Lawyer and human rights activist was arrested on April 13, 2004. The place of his detention is unknown. Aktam is president of the Committee for the Defense of Democratic Liberties and Human Rights in Syria (CDDLHR). He was imprisoned from 1991 until 1998 for criticizing human rights violations of the Assad regime. Since 2003 he has been put under pressure in an attempt to stop the activities of the CDDLHR. Nevertheless, Aktam organized a sit-in in front of Parliament, published articles and attended conferences dealing with human rights issues.

Arrest	Iran	Emadeddin Baghi	10/2004	Lawyer and human rights defender was arrested on October 4, 2004, upon leaving Iran to attend a congress on capital punishment in New York and to receive the 2004 Civil Courage Prize. His arrest followed the publication of an article addressing torture practices in Iranian prisons, in which he called for an improvement of the detention system in Iran. He was arrested in 2000 for jeopardizing the Iranian State. He was released in 2003. In October 2007, he was sentenced to another year imprisonment.
Disappearance	Thailand	Somchai Neelapajit	03/2004	Human rights lawyer disappeared in Bangkok on March 12, 2004. Vice Prime Minister Chavalit declared that he may have been seen in company of four men who may be state officials. Neelapajit was president of the Thai society for muslim lawyers and vice-president of the human rights committee of the Thai Law Society. At the moment of his disappearance, he was the lawyer of five men charged with killing four soldiers during an armed robbery, and of four men who were suspected of being member of the terrorist organization Jemaah Islamiyah (JI), that has committed bombing attacks in Thailand. Neelapajit is said to have told his family that he received threats since he had started defending JI-members. In March 2009, he legally died.
Threat with disbarment	Russian Federation	Olga Georgievna Artyukhova	11/2003	Olga Georgievna Artyukhova and Evgeny Baru have been threatened with disbarment in a case concerning Boris Khodorkovsky and Platon Lebedev, two executives of the Russian oil firm Yukos. In November 2003, after a meeting with Khodorkovsky, Artyukhova was approached by someone who took her files. After ten minutes, the files were returned, except for two that concerned the defense strategy for Khodorkovsky. The documents are said to have been passed to the media, in this way making public the defense strategy. On November 17, Artyukhova filed a complaint at the Ministry of Justice. Two weeks later, the Minister of Justice made a request to the Moscow Bar Association, asking for disbarment of Artyukhova. The Bar Association declined.
Threat with disbarment	Russian Federation	Evgeny Baru	11/2003	Olga Georgievna Artyukhova and Evgeny Baru have been threatened with disbarment in a case concerning Boris Khodorkovsky and Platon Lebedev, two executives of the Russian oil firm Yukos.

Arrest	Sudan	Salih Mahmoud Osman	02/2004	On February 1, a Sudanese human rights lawyer was arrested by national security forces. He was detained without formal charges. The arrest seemed to be a reprisal for the Osman's activities for the human rights organization Sudanese Organization Against Torture (SOAT). It seems that the Sudanese authorities try to impede the activities of human rights defenders in order to prevent the spread of news about human rights violations in Darfur.
Arrest	Sudan	Aba Zer Ahmed al Bashir	07/2004	Human rights lawyer was released from prison for reasons that remain unclear. He was arrested on July 24, 2004, by security forces. It seems that the Sudanese authorities try to impede the activities of human rights defenders in order to prevent the spread of news about human rights violations in Darfur. The arrest and detention of Al Bashir seemed to be a reprisal.
Arrest	Russian Federation	Mikhail Trepashkin	10/2005	The Russian lawyer Trepashkin was arrested in October 2003 for illegally possessing firearms. His trial started in December 2004, after he was already convicted for publishing state secrets. Circumstances of his arrest are suspicious, however, according to Human Rights First. Trepashkin was an adviser to the commission that investigated the bombings in Moscow in September 2002, for which Chechnya was blamed. During his work for the secret service FSB, he is said to have found information which indicates the involvement of Russian authorities in the bombings. Just before he would present his evidence, he was arrested. Other commissioners have been molested, killed, poisoned or discharged.
Arrest	Lebanon	Muhammad Mugarby	02/2005	On February 26, 2005, lawyer and human rights activist Mugarby was arrested for 'assaulting the standing of the state'. Evidence against him was a report by the Lebanese Embassy in Brussels about his testimony to a commission of the European Parliament in November 2003. He was denied access to the report and the official testimony.

Arrest	Iran	Nasser Zarafshan	08/2002	Lawyer Zarafshan represented the families of two murdered Iranian journalists. He was arrested, since he had suggested that the Iranian authorities may be involved in the killings of prominent activists and intellectuals. He was put on trial in 2000 for spreading information about the killings, but was released after a month. In August 2002 he was, without a fair trial by a military court, convicted for the publication of state secrets and illegally possessing firearms and alcohol, which he denied. Human rights organizations think that Zarafshan was punished for his efforts to find the truth.
Harassment	Tunisia	Radhia Nasraoui	02/2005	Prominent human rights lawyer Nasraoui was denied access to her clients several times. According to her, this is because of the inhumane conditions of detention for them. Meanwhile, the presence of police forces surrounding her home has increased.
Arrest	Nepal	Krishna Pahadi	02/2005	Fourteen human rights lawyers have been arrested on February 1, 2005, when the Nepalese king dismissed the government and declared the state of emergency. During the past months, the human rights situation has deteriorated against the background of the conflict between the government and Maoist rebels.
Arrest	Nepal	Sindhu Nath Pyakurel	02/2005	Fourteen human rights lawyers have been arrested on February 1, 2005, when the Nepalese king dismissed the government and declared the state of emergency. During the past months, the human rights situation has deteriorated against the background of the conflict between the government and Maoist rebels.

Arrest	Cuba	Hector Palacios	04/2005	Human rights lawyer and librarian Palacios was arrested in 2003. In 2005 he was still imprisoned, although his medical conditions were bad. He was convicted to 25 years in prison for treason and the possession and spread of 'subversive' literature.
Threats	Mexico	Leonel Rivero Rodríguez	05/2005	Lawyer again received death threats by telephone. The calls may be connected to his work as counsel for protesting students. He received bodyguards after his colleague was murdered in 2001. Mexican authorities have never properly investigated the threats.
Arrest	Sudan	Mudawi Ibrahim Adam	05/2005	Human rights defender and president of the Sudan Social Development Organization was arrested on May 8, 2005. As a result, he was not able to receive an award from Frontline Defenders. He and two colleagues have been charged with crimes against the state, conspiracy and espionage, for which they could receive the death penalty. Nevertheless, the three were released on May 16, probably as a result of international pressure.
Arrest	Uzbekistan	Saidjahon Zainabitdinov	05/2005	Lawyers and human rights activists were arrested after they tried to identify civilian casualties of an upheaval that was brutally oppressed in May, with around 750 people killed. They may face torture during detention. Zainabitdinov was arrested after reporting to foreign media.

Arrest	Uzbekistan	Sobithon Ustabaev	05/2005	Lawyers and human rights activists were arrested after they tried to identify civilian casualties of an upheaval that was brutally oppressed in May, with around 750 people killed. They may face torture during detention. Ustabaev was arrested when he peacefully protested against the massacre.
Arrest	Uzbekistan	Ulugbek Bakirov	05/2005	Lawyers and human rights activists were arrested after they tried to identify civilian casualties of an upheaval that was brutally oppressed in May, with around 750 people killed. They may face torture during detention. Bakirov and Gafurov were harassed while going to eyewitnesses for information.
Arrest	Uzbekistan	Fazleddin Gafurov	05/2005	Lawyers and human rights activists were arrested after they tried to identify civilian casualties of an upheaval that was brutally oppressed in May, with around 750 people killed. They may face torture during detention. Bakirov and Gafurov were harassed while going to eyewitnesses for information.
Arrest	Mongolia	Lodoisambuu Sanjaasuren	10/2004	Lawyer and human rights activist is denied necessary medical care in prison, where he has been since October 2004. Lodoisambuu defended Damiran, who was suspected of involvement in the murder of a politician. He was held incommunicado and tortured in order to obtain a confession. After Damiran told about his experiences on national television, both he and Lodoisambuu were sentenced to respectively one year and a half, and three years in prison for publishing state secrets.

Attack	Philippines	Romeo Capulong	03/2005	Human rights lawyer and judge Capulong has survived an attack, presumably committed by the military. The act may be linked to Capulong's investigation of a strike that was brutally oppressed by military and police forces, in Hacienda Luisita, a sugar-plantation owned by the family of former president Aquino. Seven people were killed and around hundred were injured. Capulong defended strikers and trade union leaders, but threats obstruct his activities.
Suspension	Equatorial Guinea	Fábian Nsue Nguema	06/2005	Lawyer and secretary of a political party has been suspended as a member of the Bar Association. According to Amnesty International the reasons for his suspension were political. In 2002, he defended a group of persons that was said to attempt to overthrow the government. They did not receive a fair trial according to observers on behalf of Amnesty International. Nsue Nguema was arrested, tortured and imprisoned for allegedly criticizing the government.
Arrest	Armenia	Vahe Grigoryan	10/2005	Lawyer was arrested on October 7, 2005, and was imprisoned after he was forced to confess forgery of documents. His arrest is probably linked to the fact that Grigoryan represented families whose property rights may have been violated by expropriation procedures in the centre of Yerevan, the Armenian capital. Grigorian was released on bail on February 15, 2006.
Killings	Philippines	Norman Bocar	09/2005	Since February 2005, several human rights lawyers have been killed in the Philippines. Norman Bocar was murdered on September 1, 2005. According to a Philippine human rights organization, the murders were ordered by the Philippine armed forces.

Killings	Philippines	Teresita Vidamo	02/2005	Since February 2005, several human rights lawyers have been killed in the Philippines. Teresita Vidamo was killed on February 9, 2005. According to a Philippine human rights organization, the murders were ordered by the Philippine armed forces.
Killings	Philippines	Felidito Dacut	03/2005	Since February 2005, several human rights lawyers have been killed in the Philippines. Felidito Dacut was killed on March 14, 2005. According to a Philippine human rights organization, the murders were ordered by the Philippine armed forces.
Killings	Philippines	Ambrosio Matias	05/2005	Since February 2005, several human rights lawyers have been killed in the Philippines. Ambrosio Matias was shot on May 8, 2005. According to a Philippine human rights organization, the murders were ordered by the Philippine armed forces.
Arrest/ harassment/ threats	Ethiopia	Netsanet Demissie	11/2005	Lawyer has been charged with 'assaulting the constitution'. Demissie was president of the Organization for Social Justice in Ethiopia, which participated in a network that monitored the elections in 2005. Demissie has been observed, harassed and received death threats. He was arrested in November 2005 for his alleged involvement in rallies of the opposition, which he denies.

Threats	Pakistan	Parvez Aslam Choudhry	03/ 2006	Lawyer and president of the Legal Aid for Destitute and Settlement received death threats after he acted as legal counsel to a Christian man who was charged with blasphemy.
Arrest	Tunisia	Mohamed Abbou	03/2005	Lawyer and human rights activist Mohamed Abbou was arrested and convicted, without a fair trial, to three and a half years imprisonment after he published an article criticizing torture practices in Tunisian prisons. In the article, made a comparison between the Abu Ghraib and Tunisian prisons. In February 2005 he criticized the Tunisian president for inviting the Israeli president Sharon to a UN-Summit in Tunis. Probably, this is the reason for his arrest. Abbou was released in July 2007, but was not allowed to travel abroad several times. It was announced on March 28, 2009, that Abbou's travel ban was lifted.
Killing	Brazil	Marcelo Denadai	04/2002	Brazilian lawyer was shot dead on April 15, 2002, in the struggle against crime and corruption, especially in relation to a prominent business man, Pagotto.
Threats/ harassment	Brazil	Maria Aparecida Denadai	06/2006	Brazilian lawyer was shot dead on April 15, 2002, in the struggle against crime and corruption, especially in relation to a prominent business man, Pagotto. After his death, Marcelo's sister, Maria Aparecida Denadai, continued his work, but was stopped several times while travelling abroad. Moreover, she has received death threats. Since June 2006, she has had police protection.

Threats	Philippines	Jobert Pahilga	01/2006	Human rights lawyer Pahilga has been threatened and harassed. Moreover, his family and clients have been approached by persons trying to acquire information about him. Pahilga's fate is part of a larger pattern in which Philippine lawyers are being harassed, intimidated and murdered.
Killings	Philippines	Carlo Umminga	04/2006	On April 14, 2006, Carlo Umminga was shot dead in front of his house.
Killings	Philippines	Rogelio Montero	05/2006	Rogelio Montero, who defended small farmers in expropriation procedures, was shot dead on May 15, 2006.
Arrest	Iran	Abdolfattah Soltani	07/2006	On July 16, 2006, Iranian lawyer learnt that he had been sentenced to five years imprisonment for publishing secret information in cases where he acted as defense counsel for persons suspected of espionage for American and Israeli intelligence services. The trial took place behind closed doors. Soltani and his lawyers were not allowed to attend the verdict. As a result of the judgment, he has been disbarred. According to human rights organizations, such as Amnesty International, Soltani's case is politically motivated and indicates Iran's reluctance to tolerate criticism on the authorities. On May 28, 2007, Soltani has been acquitted in appeal.

Threats	Zimbabwe	Arnold Tsunga	09/2006 (publication by L4L)	Lawyer Arnold Tsunga has been harassed, threatened and arrested several times. Moreover, the Mugabe regime has targeted the Zimbabwe Law Society, an independent organ charged with supervising the legal profession, of which Tsunga is a member. The ZLS has been accused of helping foreign countries to restore colonial rule, after they criticized human rights violations by the regime.
Threats/ harassments	Indonesia	Henry David	09/2006	Member of a group of lawyers that works for a human rights organization. They were charged with defamation and threatening on September 1, 2006. The charges were solely based on statements made as counsel of suspects in a criminal case in Papua concerning 16 people participating in demonstrations in Abepura in March 2006. The demonstrations, that demanded the withdrawal of security forces from a mining area, turned violent as police forces intervened. Four police officers died. During the trial, the lawyers complained about the presence of heavily armed police forces in court, which was experienced as intimidating. Moreover, three suspects were beaten before their lawyer's eyes. The lawyers themselves were threatened as well, receiving text messages stating 'You and your family will not see the sun because you have become trouble makers. The devil waits for you and your family'.
Threats/ harassments	Indonesia	Yustina Haluk	09/2006	Member of a group of lawyers that works for a human rights organization. They were charged with defamation and threatening on September 1, 2006. The charges were solely based on statements made as counsel of suspects in a criminal case in Papua concerning 16 people participating in demonstrations in Abepura in March 2006. The demonstrations, that demanded the withdrawal of security forces from a mining area, turned violent as police forces intervened. Four police officers died. During the trial, the lawyers complained about the presence of heavily armed police forces in court, which was experienced as intimidating. Moreover, three suspects were beaten before their lawyer's eyes. The lawyers themselves were threatened as well, receiving text messages stating 'You and your family will not see the sun because you have become trouble makers. The devil waits for you and your family'.

Threats/ harassments	Indonesia	Frederika Korain	09/2006	Member of a group of lawyers that works for a human rights organization. They were charged with defamation and threatening on September 1, 2006. The charges were solely based on statements made as counsel of suspects in a criminal case in Papua concerning 16 people participating in demonstrations in Abepura in March 2006. The demonstrations, that demanded the withdrawal of security forces from a mining area, turned violent as police forces intervened. Four police officers died. During the trial, the lawyers complained about the presence of heavily armed police forces in court, which was experienced as intimidating. Moreover, three suspects were beaten before their lawyer's eyes. The lawyers themselves were threatened as well, receiving text messages stating 'You and your family will not see the sun because you have become trouble makers. The devil waits for you and your family'.
Threats/ harassments	Indonesia	Johnson Panjaitan	09/2006	Member of a group of lawyers that works for a human rights organization. They were charged with defamation and threatening on September 1, 2006. The charges were solely based on statements made as counsel of suspects in a criminal case in Papua concerning 16 people participating in demonstrations in Abepura in March 2006. The demonstrations, that demanded the withdrawal of security forces from a mining area, turned violent as police forces intervened. Four police officers died. During the trial, the lawyers complained about the presence of heavily armed police forces in court, which was experienced as intimidating. Moreover, three suspects were beaten before their lawyer's eyes. The lawyers themselves were threatened as well, receiving text messages stating 'You and your family will not see the sun because you have become trouble makers. The devil waits for you and your family'.

Threats/ harassments	Indonesia	Aloisius Renwarin	09/2006	Member of a group of lawyers that works for a human rights organization. They were charged with defamation and threatening on September 1, 2006. The charges were solely based on statements made as counsel of suspects in a criminal case in Papua concerning 16 people participating in demonstrations in Abepura in March 2006. The demonstrations, that demanded the withdrawal of security forces from a mining area, turned violent as police forces intervened. Four police officers died. During the trial, the lawyers complained about the presence of heavily armed police forces in court, which was experienced as intimidating. Moreover, three suspects were beaten before their lawyer's eyes. The lawyers themselves were threatened as well, receiving text messages stating 'You and your family will not see the sun because you have become trouble makers. The devil waits for you and your family'.
Threats/ harassments	Indonesia	Selfi Sanggenafa	09/2006	Member of a group of lawyers that works for a human rights organization. They were charged with defamation and threatening on September 1, 2006. The charges were solely based on statements made as counsel of suspects in a criminal case in Papua concerning 16 people participating in demonstrations in Abepura in March 2006. The demonstrations, that demanded the withdrawal of security forces from a mining area, turned violent as police forces intervened. Four police officers died. During the trial, the lawyers complained about the presence of heavily armed police forces in court, which was experienced as intimidating. Moreover, three suspects were beaten before their lawyer's eyes. The lawyers themselves were threatened as well, receiving text messages stating 'You and your family will not see the sun because you have become trouble makers. The devil waits for you and your family'.

Threats/ harassments	Indonesia	Oliver Sitorius	09/2006	Member of a group of lawyers that works for a human rights organization. They were charged with defamation and threatening on September 1, 2006. The charges were solely based on statements made as counsel of suspects in a criminal case in Papua concerning 16 people participating in demonstrations in Abepura in March 2006. The demonstrations, that demanded the withdrawal of security forces from a mining area, turned violent as police forces intervened. Four police officers died. During the trial, the lawyers complained about the presence of heavily armed police forces in court, which was experienced as intimidating. Moreover, three suspects were beaten before their lawyer's eyes. The lawyers themselves were threatened as well, receiving text messages stating 'You and your family will not see the sun because you have become trouble makers. The devil waits for you and your family'.
Threats/ harassments	Indonesia	Ecoline Situmorang	09/2006	Member of a group of lawyers that works for a human rights organization. They were charged with defamation and threatening on September 1, 2006. The charges were solely based on statements made as counsel of suspects in a criminal case in Papua concerning 16 people participating in demonstrations in Abepura in March 2006. The demonstrations, that demanded the withdrawal of security forces from a mining area, turned violent as police forces intervened. Four police officers died. During the trial, the lawyers complained about the presence of heavily armed police forces in court, which was experienced as intimidating. Moreover, three suspects were beaten before their lawyer's eyes. The lawyers themselves were threatened as well, receiving text messages stating 'You and your family will not see the sun because you have become trouble makers. The devil waits for you and your family'.

Threats/ harassments	Indonesia	Adolf Waramori	09/2006	Member of a group of lawyers that works for a human rights organization. They were charged with defamation and threatening on September 1, 2006. The charges were solely based on statements made as counsel of suspects in a criminal case in Papua concerning 16 people participating in demonstrations in Abepura in March 2006. The demonstrations, that demanded the withdrawal of security forces from a mining area, turned violent as police forces intervened. Four police officers died. During the trial, the lawyers complained about the presence of heavily armed police forces in court, which was experienced as intimidating. Moreover, three suspects were beaten before their lawyer's eyes. The lawyers themselves were threatened as well, receiving text messages stating 'You and your family will not see the sun because you have become trouble makers. The devil waits for you and your family'.
Threats/ harassments/ threats with disbarment	Sri Lanka	Elmo Perera	11/ 2006 (publication by L4L)	Lawyers have been harassed and threatened during their efforts to defend civilians who have become victims arbitrary arrests or harassments against the background of the conflict between the government and the Tamil Tigers. The lawyers are considered as persona non grata. According to the Asian Human Rights Commission, lawyers have not only been threatened by police forces, but also by legal authorities, in particular judges from the Supreme Court. For this reason, lawyers have been reluctant to start proceedings before the Supreme Court. A common instrument in this respect is a threat with disbarment. Lawyer Elmo Perera, for example, has to demonstrate in a separate procedure that he should not be disbarred.
Arrest/ disappearance	China	Gao Zhisheng	08/2006	Chinese lawyer Gao Zhisheng has been representing persons in political sensitive cases. In November 2005, his office was closed by the authorities. One month later, he was disbarred. Moreover, he was permanently observed by police forces and became the target of an attack on his life, in which, according to Zhisheng, the Chinese authorities were involved. He was arrested on August 15, 2006. He was released after a few months, but was placed under surveillance in November 2007 and disappeared on January 19, 2009.

Arrest	China	Zheng Enchong	06/2003	Zheng Enchong was disbarred in 2001 after he acted as legal counsel to 500 families that had to move as a result of an urban restructuring programme. Nevertheless, he continued to give legal advice. In June 2003, Enchong was arrested and sentenced to three years in prison for stealing state secrets. Since his release in June 2006, he has been arrested several times.
Arrest	China	Chen Guancheng	08/2006	Chen Guancheng was sentenced to four years in prison in August 2006 after he acted as legal counsel in a procedure against local state officials. He was severely beaten in June 2006. According to Guancheng himself, he is treated badly because of his plan to appeal to his sentence. Amnesty International fears that he will be tortured.
Killing	Honduras	Dionisio Díaz García	12/2006	Honduras lawyer was murdered on December 4, 2006. Díaz García worked for a human rights organization, promoting economic, social and cultural rights. His organization investigated the treatment of former employees of several private security firms, after which he publicly concluded that the companies had violated the employees' rights. Díaz García and his colleagues received threats in relation to these investigations. State authorities have failed to take appropriate measures.
Disbarment	Morocco	Abdelattif Qanjaa	01/2007	Three Moroccan lawyers (Habib Hajji, Abdelattif Qanjaa and Khalid Bourhayel) publicly criticized the corruption that is said to exist within the Court of Appeals in Tetouan District. The Public Prosecutor made a request to the Bar Association to take disciplinary measures against the lawyers. The Bar declined, after which the Public Prosecutor decided to start criminal proceedings (before the Court of Appeals of Tetouan). In January 2007, Qanjaa was disbarred.

Killing	Philippines	Gil Gojol	12/2006	Philippine human rights lawyer Gojol was murdered on December 12, 2006.
Killing	Philippines	Nathaniel Pattugalan	01/2007	Judge Pattugalan was killed on January 19, 2007.
Threats	Philippines	Harry Roque	12/2006	Lawyer Harry Roque received death threats after he started a case against the president's husband.
Arrest	Syria	Anwar al-Bunni	05/2006	Human rights lawyer Al-Bunni was arrested in May 2006 after he signed a petition urging Syria and Lebanon to improve their relations. He was accused of spreading information that is 'harmful to the nation' and insulting to state organs. According to human rights organizations, his detention is linked to Al-Bunni criticism on torture practices by Syrian security forces and his demand for democracy and reforms in Syria. In Spring 2007, he has been tortured. As a lawyer, he acted as counsel in several human rights cases. He and his family have been threatened. Al-Bunni has also been victim of defamation campaigns by state authorities and suspension measures by his own Bar Association.

Arrest	Lebanon	Muhammad Mugarby	11/2008	Human rights lawyer Mugarby has fled his country as he received information that an arrest warrant against him was imminent. Mugarby has been harassed by the Lebanese authorities, the Syrian occupation force and the Bar Association of Beirut (BAB). He has been victim of 'fabricated charges' multiple times. For example, he had been charged with contempt for state officials, after he made a speech to European Parliament on November 4, 2003, in which he criticized the Lebanese judiciary. On November 28, 2008, however, he has been acquitted. Harassments continue up until today.
Arrest/ threat with disbarment/ harassment	Russian Federation	Karina Moskalenko	02/2007	Human rights lawyer Moskalenko acted as legal counsel in several political sensitive cases, in particular torture cases, disappearances, or cases related to the conflict Chechnya. She also works for Khodorkovsky, the imprisoned former CEO of the oil firm Yukos. Moskalenko has been intimidated. In February 2007, she was arrested on a Moscow airport. After she started working for the arrested opposition leader Gasparov, she received information stating that the Public Prosecutor had requested her disbarment on April 18, 2007, because she would have violated the code of conduct in the Khodorkovsky-case. The request was declined, however, by the Moscow Bar Association on June 22, 2007. She represents the family of murdered journalist Politkovskaya in court.
Arrest	Vietnam	Nguyen Van Dai	03/2007	Nguyen Van Dai was arrested on March 6, 2007, and has been sentenced to five years imprisonment for demanding a pluralistic democratic system in Vietnam. He was found guilty of spreading anti-government propaganda. The Hanoi Bar Association has closed his law office.
Arrest	Vietnam	Le Thi Cong Nhan	03/2007	Le Thi Cong Nhan was arrested on March 6, 2007, and has been sentenced to four years imprisonment for demanding a pluralistic democratic system in Vietnam. He was found guilty of spreading anti-government propaganda. The Hanoi Bar Association has closed his law office. His lawyer, Le Cong Dinh, was arrested on June 13, 2009.

Arrest	Vietnam	Nguyen Bac Truyen	06/2009 (publication by L4L)	Nguyen Bac Truyen has been sentenced to four years imprisonment. His lawyer, Le Cong Dinh, was arrested on June 13, 2009.
Arrest	Vietnam	Le Quoc Quan	03/2007	Lawyer Le Quoc Quan may receive the death penalty for 'attempting to overthrow the government'.
Arrest	Vietnam	Bui Thi Kim Thanh	11/2006	Bui Thi Kim Thanh, a lawyer who worked for a political party striving after a pluralistic democratic party system and provided legal assistance to expropriated land owners, was interned in a mental institution in November 2006. She was released on July 18, 2007.
Threats	Mexico	Jesus Manuel Grijalva	06/2007	Severely threatened in June 2007.

Threats	Mexico	Mayen Arellanes	05/2007	Intimidated twice while walking on the street in May 2007.
Threats	Cambodia	Don Vibol	08/2007 (publication by L4L)	Member of the Legal Aid Cambodia (LAC) that provides free legal assistance. Vibol has been threatened, together with other lawyers of LAC. They defend land owners in cases concerning property rights. On January 23, 2007, the lawyers started proceedings against a powerful business woman who is said to have acquired land illegally. The woman is brother of the Minister of Finance and married to the Minister of Land Management. Recently, she has accused the lawyers of fraud and deceit. She has also asked the Bar Association to take disciplinary measures against the lawyers, and has expressed grave threats to them during negotiations.
Threats	Cambodia	Hang Som On	08/2007 (publication by L4L)	Member of the Legal Aid Cambodia (LAC) that provides free legal assistance. Hang Som On has been threatened, together with other lawyers of LAC. They defend land owners in cases concerning property rights. On January 23, 2007, the lawyers started proceedings against a powerful business woman who is said to have acquired land illegally. The woman is brother of the Minister of Finance and married to the Minister of Land Management. Recently, she has accused the lawyers of fraud and deceit. She has also asked the Bar Association to take disciplinary measures against the lawyers, and has expressed grave threats to them during negotiations.
Threats	Cambodia	Ny Chandy	08/2007 (publication by L4L)	Member of the Legal Aid Cambodia (LAC) that provides free legal assistance. Ny Chandy has been threatened, together with other lawyers of LAC. They defend land owners in cases concerning property rights. On January 23, 2007, the lawyers started proceedings against a powerful business woman who is said to have acquired land illegally. The woman is brother of the Minister of Finance and married to the Minister of Land Management. Recently, she has accused the lawyers of fraud and deceit. She has also asked the Bar Association to take disciplinary measures against the lawyers, and has expressed grave threats to them during negotiations.

Arrest/ threats	Nepal	Jitman Basnet	02/2004	Lawyers representing victims of the conflict between the government and the Maoist rebels, have been target of attacks and threats since the end of the conflict, especially in cases related to the involvement of the military and national security forces in human rights violations. Lawyers have been threatened and harassed or disappear. Jitman Basnet is one of them. He was arrested in February 2004 and held in detention for 9 months, during which he has been tortured. He received telephone calls with death threats on May 21, August 7, 11 and 18, 2007. His request for police protection has not been met so far.
Threats/ arrests	Zimbabwe	Kucaca Phulu	08/2007	On August 22, 2007, lawyer Kucaca Phulu has received death threats by telephone by a collaborator of the ZANUPF, the political party of president Mugabe. According to Zimbabwe Lawyers for Human Rights (ZLHR), this incident is illustrative of the treatment of lawyers on Zimbabwe in general, especially in cases in which they act as legal counsel to political activists.
Arrest	Zimbabwe	Andrew Makoni	06/2008	Makoni and Muchadehama, members of the ZLHR, both have been imprisoned for a short period, after they requested the release of their clients, who had been detained without formal charges. Makoni had to flee his country as he was informed that was on a black list. A little earlier, four of his clients were murdered.
Arrest	Zimbabwe	Alex Muchadehama	05/2009	Makoni and Muchadehama, members of the ZLHR, both have been imprisoned for a short period, after they requested the release of their clients, who had been detained without formal charges. On May 14, 2009, Muchadehama has been arrested. He was released on bail on May 15, 2009 on the condition that he weekly reports at Harare Central Police Staton.

Arrest	Pakistan	Ali Ahmed Kurd	11/2007	Since president Musharraf declared the state of emergency on November 3, 2007, lawyers have been arrested on a large scale. One of them is Ali Ahmed Kurd, former vice-president of the Pakistan Bar Association. It remains unclear where he has been detained.
Arrest	Pakistan	Jawed Iqbal Burqi	11/2007	The lawyers Jawed Iqbal and Noor Naz Agha were arrested, tortured and transferred to a prison in Karachi, where they are denied necessary medical care.
Arrest	Pakistan	Noor Naz Agha	11/2007	The lawyers Jawed Iqbal and Noor Naz Agha were arrested, tortured and transferred to a prison in Karachi, where they are denied necessary medical care.
Arrest	Pakistan	Jameela Manzoor	11/2007	Jameela Manzoor was arrested after a protest rally in Lahore and has been accused of treason. Pakistani lawyers are target because they play a leading role in the protests against president Musharraf in order to protect the Constitution.

Threat with disbarment	Saudi-Arabia	Abdullah Rahman al-Lahem	12/2007	Al-Lahem may be disbarred because he has been defending a girl who had become victim of rape. In appeal, she was sentenced to 200 lashes and six months imprisonment, instead of the 90 lashes in first instance. He openly criticized the judgment of the Court of Appeals, after which he had to face a disciplinary commission. This commission is, according to Amnesty International, an instrument of the Ministry of the Interior.
Harassment		Li Jingsong	12/2007	Human rights activist Hu Jia was formally charged with subversive activities, one month after his arrest. Both the US and the EU have urged the Chinese authorities to release him. According to his lawyers, Li Jingsong and Li Fangping, the charges were vague and unfounded. They have not been able to contact their client since his arrest on December 27, 2007, since they were denied access to Hu's place of detention. Li Jingsong placed under surveillance after he had contact with foreign media. Both lawyers are being permanently observed, and they have been summoned not to contact Hu's wife.
Harassment		Li Fangping	12/2007	Human rights activist Hu Jia was formally charged with subversive activities, one month after his arrest. Both the US and the EU have urged the Chinese authorities to release him. According to his lawyers, Li Jingsong and Li Fangping, the charges were vague and unfounded. They have not been able to contact their client since his arrest on December 27, 2007, since they were denied access to Hu's place of detention. Li Jingsong placed under surveillance after he had contact with foreign media. Both lawyers are being permanently observed, and they have been summoned not to contact Hu's wife.
Arrest	Pakistan	Atizaz Ahsan	11/2007	Harassments, threats and arrests continue in Pakistan after president Musharraf declared the state of emergency in November 2007. Two days after Atizaz Ahsan (president of the Bar Association of the Supreme Court), Tariq Mehmood (former president of the Bar Association of the Supreme Court), and Ali Ahmed Kurd (lawyer of Ifthikar Chaudry, the dismissed president of the Supreme Court) were released, they were arrested again. Lawyer and president of the Pakistan Human Rights Commission, Asma Jahangir, survived an attack on her life in the beginning of this year.

Arrest	Pakistan	Tariq Mehmood	11/2007	Harassments, threats and arrests continue in Pakistan after president Musharraf declared the state of emergency in November 2007. Two days after Atizaz Ahsan (president of the Bar Association of the Supreme Court), Tariq Mehmood (former president of the Bar Association of the Supreme Court), and Ali Ahmed Kurd (lawyer of Ifthikar Chaudry, the dismissed president of the Supreme Court) were released, they were arrested again. Lawyer and president of the Pakistan Human Rights Commission, Asma Jahangir, survived an attack on her life in the beginning of this year.
Arrest	Pakistan	Ali Ahmed Kurd	11/2007	Harassments, threats and arrests continue in Pakistan after president Musharraf declared the state of emergency in November 2007. Two days after Atizaz Ahsan (president of the Bar Association of the Supreme Court), Tariq Mehmood (former president of the Bar Association of the Supreme Court), and Ali Ahmed Kurd (lawyer of Ifthikar Chaudry, the dismissed president of the Supreme Court) were released, they were arrested again. Lawyer and president of the Pakistan Human Rights Commission, Asma Jahangir, survived an attack on her life in the beginning of this year.
Arrest	Pakistan	Asma Jahangir	11/2007	Harassments, threats and arrests continue in Pakistan after president Musharraf declared the state of emergency in November 2007. Two days after Atizaz Ahsan (president of the Bar Association of the Supreme Court), Tariq Mehmood (former president of the Bar Association of the Supreme Court), and Ali Ahmed Kurd (lawyer of Ifthikar Chaudry, the dismissed president of the Supreme Court) were released, they were arrested again. Lawyer and president of the Pakistan Human Rights Commission, Asma Jahangir, survived an attack on her life in the beginning of this year.

Threats	Mexico	Jésus Manuel Grijalva	02/2008	On February 22, 2008, Grijalva receives a letter with death threats to him and a colleague, Santiago. Grijalva has received death threats several times before. They may be linked to his criticism on state authorities because of human rights violations. Recently, Grijalva and Santiago have accused state and federal authorities of committing genocide and crimes against humanity during a political crisis in Oaxaca in 2006, after which 349 civilians were arrested, tortured and detained, mainly on the basis of fabricated charges. After last year's threats, the Inter-American Commission on Human Rights has urged the Mexican authorities to provide protection to Grijalva and Santiago. As a response, the state gave them cell phones.
Threats	Mexico	Gilberto Hernández Santiago	02/2008	On February 22, 2008, Grijalva receives a letter with death threats to him and a colleague, Santiago. Grijalva has received death threats several times before. They may be linked to his criticism on state authorities because of human rights violations. Recently, Grijalva and Santiago have accused state and federal authorities of committing genocide and crimes against humanity during a political crisis in Oaxaca in 2006, after which 349 civilians were arrested, tortured and detained, mainly on the basis of fabricated charges. After last year's threats, the Inter-American Commission on Human Rights has urged the Mexican authorities to provide protection to Grijalva and Santiago. As a response, the state gave them cell phones.
Threats	Philippines	Jobert Pahilga	05/ 2008 (publication by L4L)	Human rights lawyers continues to receive death threats.
Arrest	Zimbabwe	Harrison Nkomo	05/2008	Lawyer was arrested on May 7, 2008. He has been charged with insult and subversive activities against the regime of president Mugabe. Recently, Nkomo acted as legal counsel to two journalists, one of which worked for the opposition party, MDC. Both journalists have been detained since April 15, 2008, when the MDC demanded the publication of the results of the elections.

Harassment	Brazil	Valdênia Aparecido Paulino	09/2008 (publication by L4L)	Brazilian lawyer acts as a legal counsel to woman and children in São Paulo's slums. For this reason, she was threatened by corrupt police officers and had to flee her country. In co-operation with the Public Prosecutor, she tried to bring to court cases in which police violated fundamental rights. According to Valdênia, the police derives great advantage from the impunity and corruption in the slums. She was permanently harassed during her research; not only on the streets, but also in her office. She has been confronted with seven formal charges, among them contempt for state authorities and forgery of documents. She was also accused of involvement in a narcotics case. Although the complaints have been declined, the charges constitute an impediment for her to do her work properly.
Threat with disbarment	China	Jiang Tianyong	07/2008	Jiang Tianyong is one of the lawyers that had offered to act as legal counsel to arrested Tibetan monks. As a result, he has been warned that he faces the withdrawal of his license that allows him to work as a lawyer, which has to be extended every year. At the end of July, his license was, nevertheless, extended.
Killing	Philippines	Roberto Navidad	01/2008	On January 14, 2008, Judge Navidad was killed.
Arrest/ fabricated charges	Philippines	Remigio Saladero	10/2008	Lawyer Saladero, affiliated to the trade unions, was arrested at the end of October 2008. He has been charged with involvement in multiple (attempted) murders and arson. To lawyers, judges and even some politicians, it is clear that he has been confronted with 'fabricated charges'.

Harassment	Iran	Nareh Sotoudeh	12/2008	Sotoudeh was not allowed to leave the country to receive a human rights award in Italy on December 10, 2008.
Harassment	Iran	Shirin Ebadi	12/2008	On December 21, 2008, the law office of Nobel Prize Winner Shirin Ebadi was closed.
Threats	Sri Lanka	Ariyaratne	01/2009	Human rights lawyer Ariyaratne had to flee Sri Lanka after he received multiple death threats. Ariyaratne acts as a legal counsel in a bribery case in which a police officer is allegedly involved, and a case concerning torture practices by the police. His client in these cases was murdered on September 20, 2008. Ariyaratne received death threats by a police officer on January 27, 2009. Three days later, his law office was set afire. Police forces arrived late and refused to start a proper investigation.
Killings	Kenya	Oscar Kingara	03/2009	Kenyan lawyer Kingara was shot dead in his car. Last year, his organization published a report in he claimed that 8,040 members of the Mungiki-clan were extrajudicially killed by police forces. This political-religious group is forbidden in Kenya.

Harassment/ fabricated charges	Vietnam	Le Tran Luat	03/2009	On March 25, 2009, Vietnamese authorities closed the law office of Le Tran Luat. The incident may be linked to Luat's work as legal counsel for a group of catholic in a case concerning protest against the expropriation by state authorities. Luat stated that the police tried to hinder him from attending the court session. A few weeks earlier, he had been interrogated by the police, probably to intimidate him. Moreover, Le Tran Luat was publicly and falsely accused of forgery and fraud. It appears that justice in Vietnam is first and foremost political; the leading communist party does not seem to tolerate criticism on its policies.
Arrest	China	Teng Biao	03/2008	Lawyer Teng Biao was put under pressure to leave Beijing during the Olympics. He is not allowed to have contact with foreign media and is permanently observed. On March 6, 2008, he blindfolded and kidnapped. They interrogated him about articles he had published. He spent 41 hours in prison. Teng is one of the lawyers willing to acts a legal counsel for arrested Tibetan monks. Since May, he is not allowed to work as a lawyer, since his licence was withdrawn.
Killing	Russian Federation	Stanislav Markelov	01/2009	Human rights lawyer Markelov was shot dead in Moscow on January 21, 2009. Markelov just had announced that would appeal to the release of the Russian colonel Yuri Boedanov. In 2003, this man was sentenced to 10 years imprisonment for the murder of a girl from Chechnya. A few days before his death, Markelov had said that he wanted to find out who ordered the release of Boedanov. He represented victims of torture, abuse and rape in Chechnya. Moreover, he was legal counsel to the murdered journalist Politkovskaya and (family of) victims of the tragedy in the Dubrovka Theatre in October 2002.
Harassment	Algeria	Amine Sidhoum	11/2008	The sentence of human rights lawyer Sidhoum (six months imprisonment; 20,000 dinar fine) was confirmed in appeal. On May 30, 2004, he published an article in which he allegedly insulted state authorities by stating that a judgment by the Supreme Court was 'arbitrary'. He acts as legal counsel for persons suspected of terrorist activities. During these proceedings, he often denounces torture practices and violations of the right to a fair trial.

Suspension	Equatorial Guinea	Fabián Nsue Nguema	07/2005	Lawyer has been suspended for a year by his own Bar Association without a warning. He was the lawyer of a group of South African mercenaries who were suspected of involvement in a coup d'état in March 2004. In July 2006, the suspension was lifted.
Arrest	Zimbabwe	Beatrice Mtetwa	05/2007	Mtetwa, the president of the Bar Association of Zimbabwe, was arrested in a oppression of a peaceful protest by a group of lawyers. They protested against the arrest of their colleagues Makoni and Muchadehama on May 4, 2007.
Arrest	Zimbabwe	Eric Matinenga	06/2008	Matinenga was arrested and remained in custody, although the Supreme Court had ordered his release. After a while, however, he was released on bail.
Threat with disbarment	Cambodia	Suon Visal		The independence of the Bar Association of Cambodia was in danger as the Court of Appeals declared void the election of human rights lawyer Suon Visal as its president. Visal has been confronted with threats with disbarment and disciplinary measures.

Killings	Guatemala	Rodrigo Rosenberg	05/2009	Lawyer Rosenberg was killed in Guatamala City. A few days earlier, he had recorded a video in which he predicted his own death. He accused president Colom, Colom's wife and their secretary of the murder. A friend of Rosenberg published the video on websites and forwarded it to news agencies. Rosenberg states that his death is related to the murder on one of his clients in April 2009, who is said to have refused to co-operate with the government in acts of corruption and fraud. Rosenberg had received threats earlier.
Attack. threats	Guatemala	Amilcar Pop	08/2008	Lawyer was forced to stop his car. Two armed men shouted 'We're going to kill you, you're dead already!'. Pop managed to flee by driving away fast. He had received many death threats during the year prior to the attack.
Arrest	Vietnam	Le Cong Dinh	06/2009	Lawyer Le Cong Dinh was arrested on June 13, 2009. He represented a number of journalists, human rights activists, bloggers and lawyers. Moreover, he regularly publishes in foreign media and several Vietnamese website that are qualified as 'subversive' by state authorities. Le Cong Dinh has been accused of violating article 88 of the Criminal Code, by spreading anti-governmental propaganda and by displaying subversive activities. Earlier, Le Cong Dinh had represented Le Thi Cong Nhan en Nguyen Bac Truyen.
Harassment/ threats with disbarment	Cambodia	Kong Sam Onn	06/2009	Cambodian lawyer has been confronted with a criminal defamation complaint. Moreover, the Bar Association threatened him with disbarment on June 16, 2009. Kong Sam Onn represents Mu Sochua, a member of parliament, who has criticized the Executive on several occasions, in particular in relation to expropriation procedures in Kampot Province.