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The New York City Bar Association Demands an End to the Arbitrary Detention of Prominent Lawyer Claudia Gonzalez by the Guatemalan Government and Advocates for Broader International Protection for the Legal Profession

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On August 28, 2023, award-winning lawyer Claudia Gonzalez¹ was arrested and charged with “abuse of power” related to a case she litigated while an attorney at the International Commission Against Impunity in Guatemala (“CICIG”). In her capacity at CICIG, Ms. Gonzalez sued a Supreme Court magistrate accused of pressuring a fellow judge overseeing a corruption case involving that magistrate’s son.

At the time of her arrest, Ms. Gonzalez was one of the few attorneys in Guatemala courageous enough to represent lawyers, judges, and prosecutors (collectively “justice operators”) facing criminal charges for investigating or hearing corruption cases. She was the legal representative for at least 16 of these justice operators, who are currently either incarcerated or exiled.

The charges against Ms. Gonzalez are designed to retaliate against her work at CICIG and her work defending justice operators.

The New York City Bar Association (“City Bar”)² urges Guatemalan authorities to ensure a fair, internationally supervised trial for Claudia Gonzalez. The City Bar also calls on the United Nations Working Group on Arbitrary Detention (“UNWGAD”)³ to work with global entities to safeguard the legal profession and to include the legal profession facing arbitrary detention within the ambit of its protected classes.

Background

CICIG was an international and independent anticorruption body created by the United Nations at the request of, and in collaboration with, the Government of Guatemala. CICIG's mandate included conducting independent investigations into corruption, serving as a "complementary prosecutor" to support or join the Guatemalan government in criminal complaints on corruption cases, and to recommend the adoption of public policies designed to combat corruption.⁴ Under this mandate, CICIG and the Guatemalan government successfully prosecuted government officials, Supreme Court and Congress members, and other members of organized crime involved in corrupt acts.⁵

Ms. Gonzalez was a CICIG attorney until 2019. In this capacity, Ms. Gonzalez represented CICIG as a joint party with the Government of Guatemala in a criminal complaint against Blanca Stalling, a Supreme Court magistrate accused of pressuring Judge Carlos Ruano⁶ to grant leniency to Stalling's son, who was implicated in a separate corruption case.⁷

In 2019, President Jimmy Morales refused to renew CICIG's mandate. Before and after taking office, he initially supported CICIG's work, but later became critical of CICIG after a corruption case was brought involving both his son and his brother. Morales then distanced himself from the CICIG and the Special Prosecutors Office Against Impunity in Guatemala ("FECI") and later denounced alleged abuses committed by CICIG.⁸

Following the non-renewal of CICIG's mandate, former officials, including Ms. Gonzalez, have been facing persecution and criminal prosecution in retaliation for their efforts in combating corruption.⁹

Before her arrest, Ms. Gonzalez was focused on defending these former prosecutors charged with abuses of power in relation to their work combating corruption in Guatemala.¹⁰ At the time of her arrest, Ms. Gonzalez was legal counsel to 16 anti-corruption justice operators. Among them:

- Juan Francisco Sandoval, former Chief of the FECI, who is in exile.
- Carlos Videz, former FECI prosecutor, who is in exile.
- Virginia Laparra, former FECI prosecutor, who is in prison.¹¹

On August 28, 2023, the Office of the Prosecutor ordered a search of Claudia Gonzalez's home. They seized her computer, cell phone, and a USB device. Ms. Gonzalez's attorneys claimed that the Prosecutor sought to seize work product and attorney-client privileged communications. She was then arrested and charged with "abuse of power" for her prior work at CICIG. Prominent lawyers have stated that neither Ms. Gonzalez nor other members of the CICIG were serving as public officials during their tenure with this institution,¹³ which means CICIG lawyers cannot be charged with the crime of "abuse of power" because that crime is committed exclusively by public officials.¹⁴

The Prosecutor never informed Ms. Gonzalez of the investigation details and denied her access to relevant records. The Court also ordered that the records surrounding her arrest and even the facts to be charged be maintained under seal.¹⁵

Ms. Gonzalez's case has been overseen by Judge Jimi Bremer,¹⁶ who the United States currently designates as an individual engaged in conduct that undermines democratic processes and

institutions by authorizing politically motivated criminal charges in Guatemala.¹⁷ Sources claim Judge Bremer has sealed Ms. Gonzalez's case and ordered the exclusion of the public from the hearings to prevent further publicity.¹⁸

Judge Bremer attempted to deny an initial oral hearing, providing just a notification paper to be signed.¹⁹ After Ms. Gonzalez's strong complaints, he agreed to do the initial hearing but delayed it for 26 days. During those days, the hearing was delayed because Judge Bremer stated he did not have time to hear her case. On other occasions, it was delayed because no one from the Prosecutor's Office attended her hearing.²⁰

Ms. Gonzalez was only informed of the specific factual basis for the charged crimes after a Court of Appeals gave Judge Bremer a 48-hour deadline to conclude the initial hearing. The prosecutor charged her with "abuse of power" in the case she litigated against Stalling.²¹ An arrest warrant was also issued for Judge Carlos Ruano for denouncing Stalling's attack on his judicial independence; and other former CICIG and FECCI lawyers involved in the investigation against Stalling also faced arrest warrants.²²

Ms. Gonzalez was then transferred to the Mariscal Zavala Preventive Detention Center, where she was held for 80 days.²³

On November 10, 2023, an Appeals Court upheld the appeal of Ms. Gonzalez's lawyers and ordered that she be moved to house arrest within 3 days; (she was not actually moved until six days later).²⁴

This year, the City Bar issued other statements involving Guatemala, including a statement against Guatemala's efforts to criminalize the legal profession in cases involving corruption.²⁵ Such targeted criminalization has been used as a strategy to secure impunity in corruption cases.²⁶

International law framework and violations.

Guatemala's conduct towards Ms. Gonzalez and other members of the legal profession violates at least four international legal standards: (1) the Basic Principles on the Role of Lawyers; (2) the Declaration on Human Rights Defenders; (3) Gonzalez's clients' right to counsel of their choosing; and (4) prohibitions against arbitrary detention.

First, Guatemala is failing to protect the independence of the legal profession. The UN Basic Principles on the Role of Lawyers (the "Principles") recognize the right of lawyers to practice their profession without intimidation or interference²⁷ and not to suffer violations simply for representing their clients.²⁸ Ms. Gonzalez was arrested in reprisal for engaging in the legal profession, first as a representative of CICIG and then for representing criminally charged justice operators. The government is punishing her as an extension of her clients who were criminally charged, in direct violation of the Principles.²⁹

Second, Guatemala is failing to protect Ms. Gonzalez as a human rights defender. The Declaration on Human Rights Defenders ("DHRD"), Article 12, requires States to protect human

rights defenders against any arbitrary action related to the legitimate exercise of their rights.³⁰ Here, Ms. Gonzalez can be considered a human rights defender, particularly of justice operators who have been criminally charged. International bodies have largely viewed such criminalization as a human rights violation.³¹ Arresting Ms. Gonzalez for defending human rights specifically violated Article 12.

Third, Guatemala is denying 16 criminalized justice operators their right to counsel by the pretextual arrest and detention of Ms. Gonzalez. The violation of the Principles and the DHRD is inextricably bound up with the right of those accused of a crime to be represented by counsel under Article 14.3 of the International Covenant on Civil and Political Rights (the “Covenant”). Here, the arrest of Ms. Gonzalez interferes with the right to counsel of the 16 victims of human rights violations that she represented, infringing both the DHRD and the Covenant.

Fourth, Ms. Gonzalez is being arbitrarily detained. The United Nations Working Group on Arbitrary Detention (UNWGAD) includes house arrest as a form of detention that may be deemed to be “arbitrary”³² if it falls into at least one of five categories,³³ nearly all of which appear to have been violated here:

1. Category I: “When it is clearly impossible to invoke any legal basis justifying the deprivation of liberty (as when a person is kept in detention after the completion of their sentence or despite an amnesty law applicable to them).” This category invokes the right to due process and freedom from unlawful detention provided in Article 9 of the Covenant. It is insufficient for a national law or practice to authorize the arrest and detention of a suspect; instead, authorities must invoke a legal basis consistent with international human rights standards, i.e., that detention is necessary and reasonable.³⁴ Here, Ms. Gonzalez’s case appears to lack a legal basis to justify a deprivation of liberty, as she was arrested and detained solely in her professional capacity as a representative of CICIG and then as a lawyer representing justice operators.
2. Category II: “When the deprivation of liberty results from the exercise of the rights or freedoms guaranteed by articles 7, 13, 14, 18, 19, 20 and 21 of the Universal Declaration of Human Rights and, insofar as States parties are concerned, by articles 12, 18, 19, 21, 22, 25, 26 and 27 of the International Covenant on Civil and Political Rights.” In essence, this category defines detention as arbitrary if it results from exercising the rights to freedom of opinion and expression. In this case, Ms. Gonzalez’s political opinion is a public concern because denouncing corruption implies a belief in transparent, accountable, and honest governance. All Guatemalans have the right and obligation to hold such an opinion.³⁵ Retaliating against her due to her anti-corruption efforts violates international law, which protects against discrimination based on political opinion under the Universal Declaration of Human Rights (UHDR), Article 19.
3. Category III: “When the total or partial non-observance of the international norms relating to the right to a fair trial, spelled out in the Universal Declaration of Human Rights and in the relevant international instruments accepted by the States concerned, is of such gravity

as to give the deprivation of liberty an arbitrary character.” In the instant case, Guatemala has not observed two principal rights. First, the Right to a Public Trial: the UNWGAD has stated that, even in cases when the trial of a person concerns issues of national security, proceedings should not be shrouded by secrecy and opacity whereby no information is provided to the public. Even in such cases, trials must appear to a reasonable observer to be impartial.³⁶ Here, the investigation against Ms. Gonzalez has been kept under seal. Also, the public has been excluded from the hearings without any reasonable justification, which violates Ms. Gonzalez’s right to a fair and public trial recognized by Articles 9, 10, and 11 of the UDHR and Article 26 of the American Declaration of the Rights and Duties of Man (the “American Declaration”).³⁷ Second, The Right to a Speedy Presentment: The UNWGAD has stated that Article 14.3(a) of the Covenant and Article 7.6 of the American Convention on Human Rights (“American Convention”)³⁸ requires that everyone has the right to be informed promptly and in detail of the nature and cause of the charge against him. Here, Ms. Gonzalez was arrested and detained for more than 26 days without an initial hearing before a judge or any reasonable justification for such a delay.

4. Category V: “When the deprivation of liberty constitutes a violation of international law for reasons of discrimination based on birth; national, ethnic or social origin; language; religion; economic condition; political or other opinion; gender; sexual orientation; or disability or other status, and which aims towards or can result in ignoring the equality of human rights.” The term “other status” includes an individual’s employment or profession.³⁹ In Opinion 70/2021, the UNWGAD found that the arbitrary detention, criminal charges, and convictions at issue were directly related to two individuals’ employment. In that Opinion, the UNWGAD identified Category V as the basis for finding the detention arbitrary because of the individuals’ “other status,” as employees. Similarly, Ms. Gonzalez’s arrest is based on her employment as a trial attorney representing CICIG and criminally charged anticorruption justice operators. But for her work as an attorney and representative of CICIG, the Guatemalan government would not have arbitrarily detained and charged her. Further, Guatemalan authorities are attempting to leverage her arbitrary detention to deter other former CICIG attorneys and other attorneys from choosing to represent interests at odds with the Guatemalan government. Accordingly, Ms. Gonzalez’s detention was discriminatory based on her “other status” as an employee of CICIG.

Relevant human rights actors, including the UN Special Rapporteur on the Independence of Judges and Lawyers, have reached similar conclusions, stating that “Claudia González’s case appears to be the latest in a series of similar cases targeting judges, prosecutors, and lawyers who have worked on corruption or human rights cases in Guatemala.”⁴⁰

Strengthening the international protections of the legal profession.

Over the past decade, the City Bar and other international organizations have documented an increasing trend of governments using arbitrary detention as a strategy against lawyers representing clients in politically sensitive and marginalized groups.⁴¹ The UN Special Rapporteur for the Independence of Judges and Lawyers has stated that, between 2010 and 2020, “more than 2,500 lawyers were killed, detained or kidnapped in different regions of the

World.”⁴² Particularly in Guatemala, more than 30 justice operators and other lawyers have been persecuted for their work on anti-corruption cases and defending human rights.⁴³ Sadly, this trend is escalating worldwide.⁴⁴

The City Bar strongly recommends that the UNWGAD examine lawyers subject to arbitrary detention, like Claudia Gonzalez, and issue a decision that includes and protects members of the legal profession as being part of "other status" under Category V of the UNWGAD because the deprivation of their liberties merely because of their role as advocates ignores their dignity as human beings.

The City Bar urges Guatemalan authorities to:

1. Immediately release Ms. Gonzalez without restriction;
2. Drop all charges against Ms. Gonzalez and end all acts of harassment against her;
3. To the extent the state continues to pursue charges against Ms. Gonzalez, the Government of Guatemala must ensure that Ms. Gonzalez receives a fair trial in compliance with international legal standards. This includes conducting a public trial and allowing the presence of international observers.
4. Guarantee that all lawyers in Guatemala can effectively carry out their legitimate professional activities without fear of reprisals and free from undue restrictions, including judicial harassment, criminal prosecution, arbitrary arrest and detention, deprivation of liberty, or other arbitrary sanctions.

The City Bar calls on the international community to:

1. Ensure that Ms. Gonzalez’s trial is internationally observed.

The City Bar calls on the UN Special Procedures to:

1. Collaborate with global bodies to classify the legal profession as a protected category under "other status" in Category V of the UNWGAD, applying the criteria in its Opinion 70/2021.

¹ In May 2023, Ms. Gonzalez received the Lawyers for Lawyers Award, recognizing legal professionals who face significant risks due to their work. Available: <https://lawyersforlawyers.org/en/guatemalan-lawyer-claudia-gonzalez-orellana-laureate-lawyers-for-lawyers-award-2023/>

² The New York City Bar Association (City Bar), founded in 1870, is an organization of over 23,000 members in New York City and elsewhere throughout the United States and in more than 50 countries around the globe. Its members include judges, prosecutors, defense counsel, government lawyers, and public interest/non-governmental organization practitioners, as well as legal academics and attorneys representing nearly every major law firm and corporation in the United States. The City Bar has a long and distinguished history of promoting the rule of law and human rights, including the rights of legal professionals to fulfill their professional obligations. The Cyrus R. Vance Center for International Justice assisted with this Statement, with support from the City Bar’s Task Force on the Independence of Lawyers and Judges and the Inter-American Affairs Committee.

³ The Working Group's mandate is to investigate cases of deprivation of liberty imposed arbitrarily or inconsistently with the international standards set forth in the Universal Declaration of Human Rights, or the international legal instruments accepted by the States concerned. The Working Group investigates alleged cases of arbitrary detention by sending urgent appeals and communications to concerned Governments to clarify and/or bring their attention to these cases. The Working Group also considers individual complaints under its regular communications procedure, leading to the adoption of opinions as to the arbitrariness of the detention. In addition, the Working Group conducts country visits to assess the situation of deprivation of liberty in the country. <https://www.ohchr.org/en/special-procedures/wg-arbitrary-detention>

4 CICIG. Article 3.1(b). Agreement. (In Spanish) Available:

https://www.cicig.org/uploads/documents/mandato/cicig_acuerdo.pdf

5 Guatemalan lawyer Claudia González Orellana laureate Lawyers for Lawyers Award 2023. April 19, 2023.

<https://lawyersforlawyers.org/en/guatemalan-lawyer-claudia-gonzalez-orellana-laureate-lawyers-for-lawyers-award-2023/>

6 UN Special Rapporteur on the Independence of Judges and Lawyers. July 14, 2023. Available: <https://www.ohchr.org/es/press-releases/2023/07/guatemala-un-expert-concerned-proceedings-against-judge-carlos-giovanni>; Judge Ruano resigned in September 2023 due to life threats and went into exile.

7 Guatemala: UN expert concerned by proceedings against Judge Carlos Giovanni Ruano. July 14, 2023. Available:

<https://www.ohchr.org/en/press-releases/2023/07/guatemala-un-expert-concerned-proceedings-against-judge-carlos-giovanni>

8 Vance Center. 2022. Criminalization of Justice Operators in Guatemala as a strategy to secure impunity. P 18. Available:

<https://www.vancecenter.org/wp-content/uploads/2022/12/ENG-Criminalization-of-Justice-Operators-in-Guatemala-as-strategy-to-secure-impunity.pdf>

9 Amnesty International. August 29, 2023. Guatemala: Abogada y defensora de los derechos humanos. (In Spanish) Available:

<https://www.amnesty.org/es/documents/amr34/7151/2023/es/>

10 Guatemalan lawyer Claudia González Orellana laureate Lawyers for Lawyers Award 2023. Id.

11 City Bar. April 18, 2023. Statement on the criminalization and sentencing of Virginia Laparra and other anti-corruption prosecutors and judges in Guatemala. <https://www.nycbar.org/member-and-career-services/committees/reports-listing/reports/detail/statement-on-virginia-laparra>

13 La Hora. Bermejo: González no puede ser considerada una empleada pública

https://lahora.gt/nacionales/lucero_sapalu/2023/09/07/bermejo-gonzalez-no-puede-ser-considerada-una-empleada-publica/#:~:text=Adem%C3%A1s%2C%20cita%20que%20E%80%9Cni%20por,o%20funcionaria%20p%C3%BAblica%E2%80%9D%2C%20resalta.

14 La hora. 22 de septiembre de 2023. Sin ser funcionaria: ligada y enviada a prisión por delito para funcionarios. (In Spanish) Available: <https://lahora.gt/nacionales/engelberth-blanco/2023/09/22/sin-ser-funcionaria-ligada-y-enviada-a-prision-por-delito-para-funcionarios/>

15 Id. Amnesty International.

16 Id. International Observatory for Lawyers.

17 Department of State. <https://gt.usembassy.gov/section-353-corrupt-and-undemocratic-actors-report-2023/>

18 Ottumwa Courier. September 21, 2023. Guatemala: Sala obliga a juez terminar audiencia de abogada que lleva 20 días detenida. (In Spanish) Available: https://www.ottumwacourier.com/spanish/noticias_de_am_rica_latina/guatemala-sala-obliga-a-juez-terminar-audiencia-de-abogada-que-lleva-20-d-as-detenido/article_60ae7c7f-1bcb-5e18-a720-906d354b0577.html

19 Minuto 33. <https://youtu.be/UltVpDXEGGY?t=33>

20 International Federation for Human Rights. August 30, 2023. Guatemala: Detención arbitraria de la abogada defensora de derechos humanos Claudia González Orellana. (In Spanish) Available: <https://www.fidh.org/es/temas/defensores-de-derechos-humanos/guatemala-detencion-arbitraria-de-la-abogada-defensora-de-derechos>

21 WOLA. 21 September 2023. <https://www.wola.org/es/2023/09/guatemala-libertad-para-claudia-gonzalez-2/>

22 Infobae. Sep. 2, 2023. Quién es Blanca Stalling, la jueza de Guatemala que estuvo arrestada por corrupción y ahora lidera su venganza desde la Corte Suprema <https://www.infobae.com/america/america-latina/2023/09/02/quien-es-blanca-stalling-la-jueza-de-guatemala-que-estuvo-arrestada-por-corrupcion-y-ahora-lidera-su-venganza-desde-la-corte-suprema/>

23 Radio Canada International. October 6, 2023. Canada. La detención de una fiscal guatemalteca preocupa en Canadá y en el mundo. Available: <https://ici.radio-canada.ca/rci/es/noticia/2015555/reportaje-arresto-guatemala-abogada-defensora-dd-hh-quietud-canada-claudia-gonzalez-orellana-argentina-laparra-asf-amnistia-internacional-pazypaz>

24 La Hora. Sala ordena la libertad de Claudia González. Nov. 10, 2023. <https://lahora.gt/nacionales/diego/2023/11/10/sala-ordena-la-libertad-de-claudia-gonzalez/>

25 Statement Deploring the Persecution of Lawyers Representing Award-Winning Anti-Corruption Journalist José Rubén Zamora in Guatemala, New York City Bar Association, March 21, 2023,

<https://www.nycbar.org/media-listing/media/detail/deploring-persecution-jose-ruben-zamora-lawyers-guatemala;>

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26 <https://www.vancecenter.org/publication/criminalizationguatemala/>

27 Id. Principles 16, 17.

28 Id. Principle 16.

29 Principle 18: Lawyers shall not be identified with their clients or their clients' causes as a result of discharging their functions.

30 The Declaration on Human Rights Defenders, Article 12.
<https://www.ohchr.org/sites/default/files/Documents/Issues/Defenders/Declaration/declaration.pdf>

31 Margaret Satterthwaite, Special Rapporteur on the independence of judges and lawyers. September 18, 2023. "The case of Claudia González seems to be the latest in a series of similar cases targeting judges, female judges, prosecutors, female lawyers, and lawyers who have worked on corruption or human rights cases in Guatemala (...) Claudia González has worked tirelessly for human rights in Guatemala," said the Special Rapporteur.

See also Inter-American Commission on Human Rights, Annual report 2022, Chapter IV. Para. 8 "the Commission warns of an intensification of judicial persecution, criminalization and abuse of the impeachment proceeding with the aim of intimidating and removing from office justice operators responsible for investigating and prosecuting cases related to the internal armed conflict, including cases that have been ruled on by the Inter-American Court of Human Rights."

³² UNWGAD. 2000. Fact Sheet No. 26: The Working Group on Arbitrary Detention. "This terminology was chosen since the objective entrusted to the Group relates to the protection of individuals against arbitrary deprivation of freedom in all its forms, and its mandate extends to deprivation of freedom either before, during or after the trial (a term of imprisonment imposed following conviction), as well as deprivation of freedom in the absence of any kind of trial (administrative detention). The Group also regarded as forms of detention measures of house arrest and rehabilitation through labour, when they are accompanied by serious restrictions on liberty of movement."

<https://www.ohchr.org/sites/default/files/Documents/Publications/FactSheet26en.pdf>

³³ See <https://www.ohchr.org/en/about-arbitrary-detention>.

34 Opinions No. 93/2017, para. 44; No. 10/2018, paras. 45 and 46; No. 36/2018, para. 40; No. 46/2018, para. 48; No. 9/2019, para. 29; No. 32/2019, para. 29; No. 33/2019, para. 48; No. 44/2019, para. 52; No. 45/2019, para. 51; No. 46/2019, para. 51; No. 65/2019, para. 59; No. 71/2019, para. 70; No. 72/2019, para. 40; No. 82/2019, para. 74; No. 6/2020, para. 39; No. 11/2020, para. 37; No. 13/2020, para. 46; No. 14/2020, para. 49; No. 31/2020, para. 40; No. 32/2020, para. 32; No. 33/2020, paras. 53 and 71; and No. 34/2020, para. 45.

35 UNWGAD Opinion 83/21, para. 93

36 UNWGAD Opinion 78/2021, para. 97. And Opinion No. 38/2023, para. 42

37 American Declaration of the Rights and Duties of Man (1948), Article XXVI.
https://www.oas.org/dil/access_to_information_human_right_American_Declaration_of_the_Rights_and_Duties_of_Man.pdf

38 American Convention on Human Rights, Article 7.6.
<https://www.oas.org/en/iachr/mandate/Basics/3.AMERICAN%20CONVENTION.pdf>

39 UNWGAD Opinion 70/2021, para. 117

40 M. Satterthwaite, UN Special Rapporteur on the Independence of Judges and Lawyers, <https://www.ohchr.org/en/press-releases/2023/09/guatemala-un-expert-concerned-about-legal-action-against-prominent-lawyer>

⁴¹ Statement Deploing the Persecution of Lawyers Representing Award-Winning Anti-Corruption Journalist José Rubén Zamora in Guatemala, New York City Bar Association, Mar. 21, 2023, <https://www.nycbar.org/media-listing/media/detail/deploring-persecution-jose-ruben-zamora-lawyers-guatemala>; Statement on the criminalization and sentencing of Virginia Laparra and other anti-corruption prosecutors and judges in Guatemala, New York City Bar Association, Apr. 18, 2023, <https://www.nycbar.org/member-and-career-services/committees/reports-listing/reports/detail/statement-on-virginia-laparra>; Statement Condemning the Continuing Harassment and Criminalization of Justice Operators in Guatemala, New York City Bar Association, May 24, 2022, <https://www.nycbar.org/member-and-career-services/committees/reports-listing/reports/detail/harassment-and-criminalization-of-justice-operators-in-guatemala>; Statement of the New York City Bar Association on the Attacks on Judge Erika Aifán Davila in Guatemala, Feb. 8, 2022, <https://www.nycbar.org/media-listing/media/detail/attacks-on-judge-erika-aifan-davila-in-guatemala>.

See also City Bar Decries Continued Persecution of Lawyers in China, New York City Bar Association, July 2020, https://www.nycbar.org/media-listing/media/detail/709-crackdown-5th-anniversary-continued-persecution-of-lawyers-in-china#_ftn3; Delegation of 60+ International Trial Observers Condemns Court Judgment in Decade-Long Criminal Prosecution of 21 Lawyers from ÇHD (Progressive Lawyers Association) and HHB (People's Law Office): Delegation Warns That "The World is Watching," New York City Bar Association, Nov. 2022, <https://www.nycbar.org/member-and-career-services/committees/reports-listing/reports/detail/international-trial-observers-condemn-prosecution-of-chd-and-hhb-in-turkey>

⁴² Report of the Special Rapporteur on the independence of judges and lawyers. July 2022. <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G22/327/15/PDF/G2232715.pdf?OpenElement>

⁴³ IACHR. Annual Report 2022. Chapter 4b. on Guatemala. Para 11. https://www.oas.org/es/cidh/docs/anual/2022/capitulos/10-IA2022_Cap_4B_GU_ES.pdf (Spanish).

⁴⁴ Lawyer for Lawyer. 2023. The Philippines: attacks against lawyers further escalating The International Observatory for Lawyers in Danger (OIAD). Activity Report Oiad 2022-2023. https://protect-lawyers.org/wp-content/uploads/Rapport-dactivite-OIAD-2023_EN.pdf