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Contact: Eric Friedman
efriedman@nycbar.org

Eli Cohen
ecohen@nycbar.org

Statement of the New York City Bar Association Marking Lawyers' Day in Turkey

New York, April 9, 2024 – The New York City Bar Association has long followed with mounting concern the situation of the lawyers, prosecutors, and judges of Turkey.^[1] Marking April 5 as Lawyers' Day in Turkey, the New York City Bar joins the international community in paying tribute to Turkish lawyers and condemning the ongoing grave challenges to the independence, and the safety and security, of lawyers, prosecutors, and judges throughout the country.^[2]

I. Recent Events Targeting Turkish Lawyers

For years Turkey has been one of the riskiest countries in the world for lawyers and other human rights defenders. The legal profession, and the justice system generally, have been key targets for an oppressive regime. As evidenced by numerous events over the last few months alone, the attacks on Turkey's lawyers are continuing unabated.

In late February, for example lawyer and human rights defender Şüheda Ronahi Çiftçi was imprisoned, accused of being a member of “a terrorist organization” based on her professional and human rights activities.^[3] Renowned lawyer Feyza Altun was similarly arrested on charges of “inciting people to hatred and hostility.”^[4] Mere days before, lawyers Didem Baydar Ünsal, Berrak Çağlar, Seda Şaraldı and Betül Vangölü Kozağaçlı – all members of the Progressive Lawyers Association (**Çağdaş Hukukçular Derneği**, or “ÇHD”) – were arrested as well.^[5]

In the most high profile case, which involves renowned human rights lawyer and elected Member of Parliament Can Atalay, Turkey is confronted with a Constitutional crisis of grave proportions. In that case, now at an impasse, Turkey's Constitutional Court (the country's highest court) is pitted against the Turkish Supreme Court and Turkey's Parliament, both of which are openly defying the Constitutional Court, and, indeed, the rule of law itself. Meanwhile, notwithstanding the Constitutional Court's order for his release, Atalay continues to languish in prison.^[6]

Events surrounding the recent elections in Turkey^[7] have been another focal point for the regime's attacks on lawyers. On April 2, police battered members of a group of 200 lawyers who had

gathered at Istanbul's Cağlayan Courthouse (the main courthouse), to read a statement protesting election irregularities in the province of Van. At least 13 of the lawyers were arrested.^[8]

Bar associations have not gone unscathed. As one very recent example, Diyarbakır prosecutors have just launched an investigation into 11 Diyarbakır Bar Association leaders on accusations of “denigrating the Turkish nation and state.” The prosecutors’ focus is a 2021 bar association statement commemorating the victims of the Armenian genocide.^[9] And, on April 4, Turkey’s Minister of Justice, Yılmaz Tunç, accused Turkish bar associations of operating as a *de facto* opposition party – “even beyond an opposition party” – for “involving in different ideological activities.”^[10] Bar associations have incurred the ire of Turkish authorities for years.

II. Special Protections for Lawyers Under International Law

International law recognizes the unique role that lawyers play in any society. Because lawyers serve as the guardians of justice for all, international law accords lawyers special protections.^[11] For example, the United Nations Basic Principles on the Role of Lawyers provide that clients’ positions and causes are not to be attributed to their counsel.^[12] In other words, as an advocate, a lawyer is obligated to make the best case possible for a client. But no matter who the client is and no matter what the client’s position or cause may be, that position or cause is not attributable to the lawyer personally.

The U.N. Basic Principles on Lawyers further provide that governments are to “ensure that lawyers are able to perform all of their professional functions without intimidation, hindrance, harassment or improper interference.”^[13] Further, “[w]here the security of lawyers is threatened as a result of discharging their functions,” the U.N. Basic Principles on Lawyers state that the lawyers “shall be adequately safeguarded by the authorities.”^[14]

In addition, the U.N. Basic Principles on Lawyers underscore that lawyers are entitled to freedom of expression, association, and assembly. In particular, they have the right to take part in public discussion of matters concerning the law, the administration of justice, and the promotion and protection of human rights.^[15]

Like all lawyers around the world, the lawyers of Turkey are entitled to all of these protections.

III. Resolution and Call to Action

As the world marks Lawyers’ Day in Turkey, the New York City Bar Association renews its call on President Erdogan and the government of Turkey to comply with the U.N. Basic Principles on the Role of Lawyers and the U.N. Basic Principles on the Independence of the Judiciary, as well as all other relevant provisions of international law. The New York City Bar is honored to stand shoulder-to-shoulder with the courageous, beleaguered lawyers of that country. They shine as beacons for us all.

About the Association

The mission of the New York City Bar Association, which was founded in 1870 and has over 23,000 members, is to equip and mobilize a diverse legal profession to practice with excellence, promote reform of the law, and uphold the

rule of law and access to justice in support of a fair society and the public interest in our community, our nation, and throughout the world. www.nycbar.org

^[1] More than 150 years old, the New York City Bar Association (City Bar) is an organization of 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 major law firms and corporations 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 City Bar's Task Force on the Independence of Lawyers and Judges assisted with this Statement.

For an overview of the City Bar's 15-plus-year record in monitoring the situation of lawyers, prosecutors, and judges in Turkey, *see, e.g.*, Tweet on the occasion of Lawyers' Day in Turkey) (New York City Bar, April 5, 2024), <https://twitter.com/NYCBarAssn/status/1776382899048095978>; Tweet on the occasion of Lawyers' Day in Turkey (New York City Bar, April 5, 2024), <https://twitter.com/NYCBarAssn/status/1776382901040390534>; Report of an Independent International Fact-finding Mission to Turkey Examining the Treatment of Lawyers Deprived of their Liberty and Observing Trial Proceedings: 6-10 November 2023 (issued by 25 bar associations and human rights organizations, including New York City Bar (February 2024) (posted Feb. 20, 2024), https://www.nycbar.org/wp-content/uploads/2024/02/Fact-Finding-Mission-Report_Turkey_Final.pdf); Joint Statement – Turkey: The International Legal Community Condemns the Detention of Four ÇHD Lawyers and the Raid on Their Office (issued by 18 bar associations and human rights organizations, including New York City Bar (Feb. 8, 2024), https://www.nycbar.org/wp-content/uploads/2024/02/2024_02_08_FINAL_Joint-Statement_Raid-of-Peoples-Law-Office-Turkey-EN-1.pdf); Joint Statement – Widespread mistreatment of lawyers in Turkey (issued by 24 bar associations and human rights organizations, including New York City Bar (Nov. 9, 2023), <https://www.nycbar.org/wp-content/uploads/2024/02/Joint-statement-Widespread-Mistreatment-of-lawyers-in-Turkey.pdf>); 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, Nov. 11, 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>; Lawyers Delegation from Europe and the USA Observe the CHD Trial in Silivri (New York City Bar, Nov. 11, 2022), <https://www.nycbar.org/member-and-career-services/committees/reports-listing/reports/detail/lawyers-delegation-from-europe-and-the-usa-observe-the-chd-trial-in-silivri>; Supporting the Legal Community in Turkey on Lawyers Day (video statement) (New York City Bar, April 5, 2021), <https://www.nycbar.org/media-listing/media/detail/supporting-the-legal-community-in-turkey-on-lawyers-day>; Tweet on the occasion of Lawyers' Day in Turkey (New York City Bar, April 5, 2021) (one of almost 20 such Tweets), https://twitter.com/nycbarassn/status/1379277863564742664?s=43&t=NWfqbn3BFeo-MgK_mAHfAQ; New York City Bar Association Condemns the Continued Retaliation by the Turkish Government against Lawyers and Judges and Bar Associations in Turkey (New York City Bar, July 16, 2020), <https://www.nycbar.org/media-listing/media/detail/opposing-turkish-government-attacks-on-lawyers>; New York City Bar Association Marks Lawyers' Day in Turkey, Decries Treatment of Legal Professionals (New York City Bar, April 5, 2020), <https://www.nycbar.org/media-listing/media/detail/turkey-lawyers-day-statement>; **Program Announcement, 2019 Day of the Endangered Lawyer – Turkey (New York City Bar, Jan. 24, 2019)**, <https://services.nycbar.org/EventDetail?EventKey=ILJ012419>; Letter to H. E. Mr. Recep Tayyip Erdoğan (President of the Republic of Turkey) on Turkish government's actions following July 2016 attempted coup (New York City Bar, Sept. 15, 2016), <https://www.nycbar.org/member-and->

[career-services/committees/reports-listing/reports/detail/letter-to-h-e-mr-recep-tayyip-erdogan-president-of-the-republic-of-turkey-on-turkish-governments-actions-following-july-2016-attempted-coup](https://www.nycbar.org/press-releases/new-york-city-bar-association-urges-government-of-turkey-to-end-attacks-on-lawyers/); News Release, New York City Bar Association Urges Government of Turkey to End Attacks on Lawyers (New York City Bar, June 24, 2013), <https://www.nycbar.org/press-releases/new-york-city-bar-association-urges-government-of-turkey-to-end-attacks-on-lawyers/>; Letter to H. E. Mr. Recep Tayyip Erdoğan (President of the Republic of Turkey) re: concerns relating to the rule of law and the targeting and detention of lawyers in Turkey (New York City Bar, June 19, 2013) (noting, inter alia, that the New York City Bar has closely followed developments in Turkey “[s]ince at least 2006”), <https://www2.nycbar.org/pdf/report/uploads/20072534-TargetingTurkeyLawyers.pdf>.

^[2] See X/Twitter Post by New York City Bar (@NYCBarAssn) (April 5, 2024) (“On Lawyers’ Day, the New York City Bar pays tribute to the courageous lawyers of Turkey who risk their licenses & liberty dedicating themselves to the rule of law and justice for all in the face of threats, intimidation and harassment by the Turkish government”), <https://twitter.com/NYCBarAssn/status/1776382899048095978>; X/Twitter Post by New York City Bar (@NYCBarAssn) (April 5, 2024) (“Turkish lawyers represent the very best of the profession and are an inspiration to us all”), <https://twitter.com/NYCBarAssn/status/1776382901040390534>; see also, e.g., X/Twitter Post by U.N. Special Rapporteur on the Independence of Judges & Lawyers (@SRjudgeslawyers) (April 5, 2024) (“On the occasion of Lawyer’s Day, marking the creation of the Turkish Bar Association in 1978, we extend our gratitude to the legal professionals working to safeguard the rule of law, the protection of human rights & the functioning of an independent judicial system.”), <https://x.com/srjudgeslawyers/status/1776289170413039988?s=12>; Statement on Lawyers’ Day in Turkey (Lawyers for Lawyers, April 5, 2024), <https://lawyersforlawyers.org/en/statement-on-lawyers-day-in-turkey/>; Statement of ABA President Mary Smith RE: Lawyers’ Day in Turkey (American Bar Association (“ABA”), April 5, 2024), <https://www.americanbar.org/news/abanews/aba-news-archives/2024/04/statement-of-aba-president-re-lawyers-day-turkey/>; X/Twitter Post by The Arrested Lawyers Initiative (@ArrestedLawyers) (April 5, 2024) (“Today is Lawyers’ Day in Turkey. Thus, it is timely to share our report with @IBAHRI on the systematic crackdown against lawyers in Turkey.”), https://x.com/arrestedlawyers/status/1776297954585821414?s=46&t=NWfqbn3BFeo-MgK_mAHfAQ. Cf. April 5 Lawyers’ Day was Celebrated (Railly News, April 6, 2024), <https://www.raillynews.com/2024/04/April-5th-Lawyers%27-Day-was-celebrated/>.

^[3] See, e.g., Lawyer and human rights defender Çiftçi sent to prison (ANF News, Feb. 24, 2024), <https://anfenglish.com/human-rights/lawyer-and-human-rights-defender-Ciftci-sent-to-prison-71920>.

^[4] See, e.g., Turkish lawyer faces up to 3 years in prison due to remarks on Islamic law (Turkish Minute, Feb. 22, 2024), <https://www.turkishminute.com/2024/02/22/turkish-lawyer-facing-up-to-3-years-in-prison-due-to-remarks-on-islamic-law/>.

^[5] The four lawyers were arrested in the wake of the February 6, 2024 armed attack on Cağlayan Courthouse (Istanbul’s main courthouse), which left three dead (including the two assailants) and several police officers wounded. Two of the four arrested lawyers are accused of participating in the attack, while the other two are charged with membership in a terrorist organization. The lawyers acknowledge that they have been representing the perpetrators in other cases, but deny all accusations that they themselves were involved in the February 6 attack or have otherwise engaged in any terrorist activity. Three of the four remain in pre-trial detention.

See, e.g., Statement on Lawyers' Day in Turkey (Lawyers for Lawyers, April 5, 2024), <https://lawyersforlawyers.org/en/statement-on-lawyers-day-in-turkey/>; Letter to President Erdogan from CCBE re: Arrest of lawyers Didem Baydar Ünsal, Berrak Çağlar, Seda Şaraldı and Betül Vangölü Kozağaçlı (Council of Bars & Law Societies of Europe ("CCBE"), Feb. 15, 2024), Turkey: The International Legal Community Condemns the Detention of Four CHD Lawyers and The Raid on Their Office (joint statement by 22 bar associations, law societies, and other human rights organizations) (The International Observatory of Lawyers at Risk ("OIAD"), Feb. 8, 2024), <https://protect-lawyers.org/en/turkey-the-international-legal-community-condemns-the-detention-of-four-chd-lawyers-and-the-raid-on-their-office/>; Turkey detains 4 lawyers on 'trumped-up charges,' says jurists association (Stockholm Center for Freedom, Feb. 7, 2024), <https://stockholmcf.org/turkey-detains-4-lawyers-on-trumped-up-charges-says-jurists-association/>; Lawyers from Progressive Lawyers' Association (Sessiz Kalma, updated Feb. 13, 2024), <https://www.sessizkalma.org/en/defender/lawyers-progressive-lawyers-association?page=1>.

^[6] See, e.g., Arslan: 'Authority to interpret the Constitution as binding belongs to the Constitutional Court' (BIA News, Feb. 28, 2024), <https://bianet.org/haber/arslan-authority-to-interpret-the-constitution-as-binding-belongs-to-the-constitutional-court-292373>; Constitutional Court President speaks up directly to Erdoğan (BIA News, Feb. 6, 2024/modified Feb. 8, 2024), <https://bianet.org/haber/constitutional-court-president-speaks-up-directly-to-erdogan-291597>; Can Atalay's lawyer: 'Rule of law has ceased to exist in Turkey' (Bia News, Jan. 31, 2024), <https://bianet.org/haber/can-atalay-s-lawyer-rule-of-law-has-ceased-to-exist-in-turkey-291235>; Turkey's parliament ejects jailed lawmaker Can Atalay, defying top court (Al-Monitor, Jan. 30, 2024), <https://www.al-monitor.com/originals/2024/01/turkeys-parliament-ejects-jailed-lawmaker-can-atalay-defying-top-court>; Turkey Faces Constitutional Crisis as Courts Clash on Opposition (Bloomberg News, Nov. 9, 2023), <https://www.bloomberg.com/news/articles/2023-11-09/turkey-constitutional-court-judges-face-trial-over-can-atalay-case?embedded-checkout=true>; Turkish courts' dispute over jailed MP fuels rule of law concerns (Reuters, Nov. 9, 2023), <https://www.reuters.com/world/middle-east/turkish-courts-spat-over-jailed-mp-fuels-rule-law-concerns-2023-11-09/>.

^[7] See generally, e.g., 'Turning point': Turkey's opposition party deals local elections blow to Erdogan (France 24, March 31, 2024/updated April 1, 2024), <https://www.france24.com/en/asia-pacific/20240331-all-eyes-on-istanbul-as-turkey-goes-to-local-polls-in-test-of-erdogan-s-popularity>; Turkish local elections: Opposition stuns Erdogan with historic victory (BBC News, April 1, 2024), <https://www.bbc.com/news/world-europe-68704375>; Erdogan suffers heavy defeat in Turkey's key local elections (The Independent, April 1, 2024), <https://www.independent.co.uk/news/world/europe/turkey-elections-erdogan-ekrem-imamoglu-b2521434.html>; Winning City Halls, Turkish Opposition Strikes Blow to Erdogan (New York Times, April 1, 2024), <https://www.nytimes.com/2024/04/01/world/middleeast/turkey-election-results.html>; Erdogan's party suffers biggest election upset in more than 20 years (The Telegraph, April 1, 2024), <https://www.telegraph.co.uk/world-news/2024/04/01/erdogan-ak-party-suffers-election-upset/>; Analysts claim Turkey's ruling party suffers 'worst ever defeat' (Daily Mail, April 1, 2024), <https://www.dailymail.co.uk/galleries/article-13260001/Analysts-claim-Turkeys-ruling-party-suffers-worst-defeat.html?ITO=applenews-us>; Opposition victories in Turkey's local elections deal Erdogan rare defeat (Washington Post, April 1, 2024), <https://www.washingtonpost.com/world/2024/04/01/turkey-elections-erdogan-akp-chp/>; How Turkey's opposition stunned Erdogan's AKP in local elections (The New Arab, April 1, 2024), <https://www.newarab.com/analysis/how-turkeys-opposition-stunned-erdogan-local-elections>; Turkey's opposition lands authoritarian Erdogan a shocking blow (Haaretz, April 1, 2024), <https://www.haaretz.com/middle-east-news/2024-04-01/ty-article-magazine/.premium/turkeys-opposition-lands-authoritarian-erdogan-a-shocking-blow/0000018e-9a35-dd2b-ad9f-da7f48730000>; Turkey's shock elections offer another lesson for the world (Washington Post, April 2, 2024),

<https://www.washingtonpost.com/world/2024/04/02/turkey-election-autocracy-global-lessons-democracy/>.

^[8] See, e.g., Turkey's pro-Kurdish party challenges overturning of candidate's election victory (Turkish Minute, April 3, 2024), <https://www.turkishminute.com/2024/04/03/turkey-pro-kurdish-party-challenge-overturning-of-candidates-election-victory/>; Turkish police attack political parties, lawyers for protesting gov't efforts to hijack Van elections (Duvar News, April 3, 2024), <https://www.duvarenglish.com/turkish-police-attack-political-parties-lawyers-for-protesting-govt-efforts-to-hijack-van-elections-news-64130>; Statement on Lawyers' Day in Turkey (Lawyers for Lawyers, April 5, 2024), <https://lawyersforlawyers.org/en/statement-on-lawyers-day-in-turkey/>.

The allegations of election irregularities centered on the Mayor's race in the province of Van, which lies on Turkey's eastern border with Iran. Abdullah Zeydan, the candidate from the pro-Kurdish Peoples' Equality and Democracy (DEM) Party won 55% of the vote in the March 31 municipal elections. However, citing a 2016 arrest and conviction, regional election authorities stripped Zeydan of his victory and handed the mayoral seat to a candidate from the ruling Justice and Development Party (AKP) who had garnered 27% of the vote. On April 3, the Supreme Election Board (YSK) announced that it had reversed the regional election commission's decision, and that Zeydan was being reinstated as the winner of the Van mayoral race. See, e.g., Kurdish politician officially assumes office in eastern Turkey after days of unrest (Turkish Minute, April 5, 2024), <https://www.turkishminute.com/2024/04/05/kurdish-politician-officially-assumed-office-in-eastern-turkey-after-day-of-unrest/>; Turkey reinstates pro-Kurdish election winner Zeydan after days of unrest in Van (BBC News, April 4, 2024), <https://www.bbc.com/news/world-europe-68730330>; Turkey's election authority reinstates pro-Kurdish mayoral election winner (Al Jazeera, April 3, 2024), <https://www.aljazeera.com/news/2024/4/3/turkeys-election-board-reinstates-pro-kurdish-mayor>; Turkey's top election authority restores newly elected pro-Kurdish mayor's right to hold office (Washington Post/Associated Press, April 3, 2024), https://www.washingtonpost.com/world/2024/04/03/turkey-prokurdish-mayor-mandate/eace24c4-f1df-11ee-a4c9-88e569a98b58_story.html; Turkey: Tensions rise after ruling overturning pro-Kurdish mayoral candidate's victory (Le Monde, April 2, 2024/updated April 3, 2024), https://www.lemonde.fr/en/europe/article/2024/04/02/turkey-tensions-rise-after-ruling-invalidating-pro-kurdish-mayoral-candidate-victory_6667195_143.html.

The very next day, on April 4, Turkey's Board of Judges and Prosecutors (HSK) launched an inquiry into the Diyarbakır 5th High Criminal Court – the court whose April 2023 ruling restored Zeydan's political rights, clearing the way for his run for office. The HSK's actions bolster concerns about the independence of the judiciary in Turkey. See, e.g., Turkey's top judicial body launches inquiry into court that reinstated Kurdish mayor's political rights (Stockholm Center for Freedom, April 4, 2024), <https://stockholmcf.org/turkeys-top-judicial-body-launches-inquiry-into-court-that-reinstated-kurdish-mayors-political-rights/>; Turkish authorities probe decision that sealed Abdullah Zeydan's Van mayoral triumph (Medya News, April 4, 2024), <https://medyanews.net/turkish-authorities-probe-decision-that-sealed-abdullah-zeydans-van-mayoral-triumph/>.

^[9] See, e.g., Bar association executives face new investigation over commemoration of Armenian genocide victims (Stockholm Center for Freedom, April 4, 2024), <https://stockholmcf.org/bar-association-executives-face-new-investigation-over-armenian-genocide-commemoration/>; Bar association executives face new investigation over commemoration of Armenian genocide victims (Turkish Minute, April 5, 2024), <https://www.turkishminute.com/2024/04/05/bar-association-executives-face-new-investigation-over-commemoration-of-armenian-genocide-victims/>.

^[10] See, e.g., Turkey’s justice minister targets bar associations, accuses them of acting like opposition party (Duvar News, April 4, 2024), <https://www.duvarenglish.com/turkeys-justice-minister-targets-bar-associations-accuses-them-of-acting-like-opposition-party-news-64141>.

^[11] See generally U.N. Basic Principles on the Role of Lawyers (Sept. 7, 1990) (“U.N. Basic Principles on Lawyers”), <https://www.ohchr.org/en/instruments-mechanisms/instruments/basic-principles-role-lawyers>; see also, e.g., Basic Principles on the Independence of the Judiciary (Sept. 6, 1985) (“U.N. Basic Principles on the Judiciary”), <https://www.ohchr.org/en/instruments-mechanisms/instruments/basic-principles-independence-judiciary>; U.N. Guidelines on the Role of Prosecutors (Sept. 7, 1990), <https://www.ohchr.org/en/instruments-mechanisms/instruments/guidelines-role-prosecutors>; U.N. Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms (Dec. 9, 1998) (“U.N. Declaration on Human Rights Defenders”), <https://www.ohchr.org/sites/default/files/Documents/Issues/Defenders/Declaration/declaration.pdf>.

The U.N. Basic Principles on the Judiciary in many respects parallel and complement the U.N. Basic Principles on the Role of Lawyers, holding governments responsible for the independence, safety, and security of judges. For example, the U.N. Basic Principles on the Judiciary obligate governments “to respect and observe the independence of the judiciary.” See *id.*, Principle 1; see also *id.*, Principle 11 (providing that, *inter alia*, the “independence” and “security” of judges “shall be adequately secured by law”). Among other things, governments are to ensure that judges are free of “restrictions, improper influences, inducements, pressures, threats [and] interferences, direct or indirect.” See *id.*, Principle 2; see also *id.*, Principle 4 (prohibiting “inappropriate [and] unwarranted interference with the judicial process”).

In turn, the U.N. Basic Principles on the Judiciary require that judges rule independently and “decide matters before them impartially, on the basis of facts and in accordance with the law,” and, further, “ensure that judicial proceedings are conducted fairly and that the rights of the parties are respected.” See U.N. Basic Principles on Judges, Principles 2 & 6.

^[12] See U.N. Basic Principles on Lawyers, Principle 18 (stating that “[l]awyers shall not be identified with their clients or their clients’ causes as a result of their functions”).

^[13] See U.N. Basic Principles on the Role of Lawyers, Principle 16.

^[14] See U.N. Basic Principles on the Role of Lawyers, Principle 17.

^[15] See U.N. Basic Principles on the Role of Lawyers, Principle 23.