

BY EMAIL

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20 March 2026

FOR THE ATTENTION OF:

- Special Rapporteur on the Independence of Judges and Lawyers
- Special Rapporteur on the Situation of Human Rights Defenders
- Special Rapporteur on Extrajudicial, Summary or Arbitrary Executions

URGENT ACTION: Death Threats Against Human Rights Lawyer Rey Gorgonio in the Philippines

Dear Mandate Holders,

1. We write to express our grave concern regarding the death threats issued on 25 January 2026 against Atty. Rey Gorgonio, Chairperson of the Negros Chapter of the National Union of Peoples' Lawyers (NUPL). These threats arise directly from his legitimate professional activities representing farming communities and detainees in Negros Occidental, forming part of a broader pattern of intimidation and attacks against legal professionals in the Philippines.
2. According to information received, a death threat was sent via text message on 25 January 2026, explicitly naming Rey Gorgonio and warning him to cease providing legal support to farming communities opposing plantation operations in Negros Occidental. The message urged others to dissociate from him and used language clearly intended to intimidate and isolate him. This threat follows ongoing surveillance and harassment against community leaders and their counsel in the region, and bears alarming similarities to threats issued prior to the killing of other Negros-based lawyers, including the murder of Atty. Benjamin Ramos in 2018. The persistence of impunity in such cases significantly heightens the risk to Atty. Gorgonio's safety.
3. The threat issued against Atty. Gorgonio is credible and imminent. It directly references his work and fits a well-documented escalation pathway observed in previous killings, where threats are followed by surveillance and eventually lethal attacks. His position within NUPL-Negros, an organisation whose members have been repeatedly targeted, further exacerbates his risk.

4. Attacks on lawyers have a profound impact on access to justice. When legal professionals are threatened or killed, entire communities lose access to representation. This particularly affects farmers, Indigenous peoples, detainees and other marginalised groups. Protecting Atty. Gorgonio is therefore vital not only for his safety, but for the preservation of the justice system and democratic accountability. In a joint communication to the Philippine government dated 15 June 2023, two UN Special Rapporteurs cautioned that, “The reported abuses are alarming on their own, but they are even more troubling as targeted attacks on legal workers that appear to be aimed at leaving communities without legal assistance.”¹

BACKGROUND AND CONTEXT

5. The threat against Atty. Gorgonio mirrors a broader pattern of systematic attacks on lawyers engaged in public interest work in the Philippines. The Philippines has long been one of the most dangerous countries in the world to be a public interest lawyer or rights defender. In June 2020, the UN High Commissioner for Human Rights’ report on the Philippines noted that “since 2015, over 40 legal professionals have been killed, many of whom were working on politically sensitive cases or advocating for land rights of farmers and indigenous peoples”.² In the 15 years from September 2007 to December 2022, a total of 271 incidents of what appear to be work-related attacks on Filipino lawyers and judges were recorded by the National Union of Peoples’ Lawyers (NUPL).³ This included 86 unlawful killings and involved 165 lawyers and 20 judges.⁴
6. A fact-finding mission by an international delegation of lawyers’ associations examined impunity around extrajudicial killings and other serious human rights abuses against legal professionals in the Philippines between 2016 and 2023. Its 2025 report, ‘Black Robes, Red Targets’, revealed a clear and consistent pattern of repression, with most attacks following a similar trajectory of escalation from surveillance, threats and intimidation to physical attacks and extra-judicial killing.⁵ It also found that the lawyers who were targeted share strikingly similar profiles: many

¹ ‘Mandates of the Special Rapporteur on the independence of judges and lawyers and the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism’ (15 June 2023, Ref.: AL PHL 2/2023).

<https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=28162>

² UN High Commissioner for Human Rights, ‘Situation of human rights in the Philippines’ (29 June 2020) UN Doc A/HRC/44/22, para. 56.

³ National Union of Peoples’ Lawyers (2024), ‘Under Siege: Attacks and Threats on Filipino Lawyers and Judges’. https://nupl.net/wp-content/uploads/2024/04/Under-Siege-Attacks_Pamphlet.pdf

⁴ Ibid., p. 2.

⁵ Caravana Filipina (2025), ‘Black Robes, Red Targets: Report of a Fact-Finding Mission on Extrajudicial Killing and other Gross Human Rights Violations against Legal Professionals in the Philippines between 2016 and 2023’. <https://www.lawyersforlawyers.org/wp-content/uploads/2025/06/CARAVANA-FILIPINA-2024-pages.pdf>

are long-standing members of lawyers' unions or associations and have dedicated their practice to defending the rights of marginalised communities.⁶

7. While attacks peaked during the term of former President Rodrigo Duterte from 2016-2022, under the current President Ferdinand Marcos Jr., in the period from 1 July 2022 to 31 December 2023, 41 attacks and threats were recorded by NUPL, including three killings of lawyers.⁷ Other forms of intimidation and undue interference with legal professionals also persist, including "red-tagging" (branding individuals as communist or terrorist sympathisers) and lawfare, often weaponising anti-terror legislation against legal professionals. These practices undermine the independence of the legal profession and create a significant chilling effect, restricting access to justice nationwide. The targeting of Atty. Gorgonio aligns with these patterns and illustrates ongoing risks faced by lawyers defending marginalised communities.

THE PHILIPPINES' OBLIGATIONS UNDER DOMESTIC AND INTERNATIONAL LAW AND THEIR APPLICATION TO THE CASE OF ATTY. REY GORGONIO

8. Under the Philippine Constitution, the State is bound to respect and protect the rights to life, liberty, security, due process, freedom of expression, and freedom of association. These guarantees necessarily include the conditions required for lawyers to carry out their professional duties freely and safely. Where a lawyer is threatened because of their legal work, the State's obligation is engaged not only in relation to their personal security, but also in relation to the rights of the clients and communities whose access to justice depends on their continued ability to act as counsel. The constitutional guarantee of due process, in particular, is inseparable from the effective exercise of the right to counsel. These principles are reinforced by the Code of Professional Responsibility and Accountability. Canon I recognises that a lawyer's independence in the discharge of professional duties, free from improper influence, pressure, or interference, is imperative to effective legal representation and to the rule of law. Canon III, Section 2 further provides that a lawyer shall uphold the Constitution, promote respect for legal processes, and safeguard human rights. Taken together, these standards affirm, even under domestic professional regulation, that lawyers must be able to perform their duties independently, safely, and without intimidation.
9. At the international level, the UN Basic Principles on the Role of Lawyers provides that lawyers must not be identified with their clients or their clients' causes (Principle 18). Furthermore, the State must ensure that lawyers can perform their professional duties "without intimidation, hindrance, harassment or improper interference"

⁶ Ibid.

⁷ National Union of Peoples' Lawyers (2024), 'No Let Up in Attacks on Judges and Lawyers Under New Marcos Government'. https://nupl.net/wp-content/uploads/2024/05/NO_LET_UP_IN_ATTACKS-final-021324.pdf

(Principle 16), and must provide adequate safeguards when their safety is threatened as a result of their legal work (Principle 17).

10. As a State Party to the International Covenant on Civil and Political Rights (ICCPR), the Philippines must respect and ensure the right to life (Article 6), liberty and security (Article 9), and the right to access an effective remedy (Article 2(3)). The failure of the Philippine government to investigate the killing and other grave human rights abuses against legal professionals, including to inform preventive measures against future loss of life, and to take sufficient measures to protect individual members of the legal profession when they face credible risks – in this case, Rey Gorgonio – represents a violation of the State’s obligations under the ICCPR.
11. Following its review of the Philippines’ implementation of the ICCPR in October 2022, the Human Rights Committee expressed its concern about the “large number of public threats, intimidation and violent attacks, including killings, of judges and lawyers, particularly those with dissenting opinions, and the delay in bringing the perpetrators to justice (art. 14)”.⁸ The Committee called on the state to, “Step up its efforts to protect judges, prosecutors and lawyers against public threats, intimidation, harassment and violence, including killings, and ensure that all violations are promptly, thoroughly, independently and impartially investigated, that the perpetrators are brought to justice and that the victims receive comprehensive redress”.⁹
12. The report of the fact-finding mission referenced above reveals systematic failures by Philippine authorities to investigate threats and attacks against legal professionals, with the majority of killings of lawyers prematurely classified as “cold cases”.¹⁰ This structural impunity constitutes a breach of the Philippines’ obligations to protect the right to life and ensure accountability. The threat against Rey Gorgonio, occurring in a region with a documented pattern of violence and absence of State protection, shows the State’s failure to provide protective measures and to prevent foreseeable harm.
13. Rey Gorgonio falls within the definition of a human rights defender, as his activities are directed at the protection of land and worker’s rights and the rights of detainees, including through advocacy aimed at safeguarding human dignity. These activities are expressly protected under international human rights law, including the UN Declaration on the Right and Responsibility of Individuals, Groups and Organs of

⁸ UN Human Rights Committee, ‘Concluding observations on the fifth periodic report of the Philippines’ (30 November 2022), CCPR/C/PHL/CO/5, para. 37.

⁹ UN Human Rights Committee, ‘Concluding observations on the fifth periodic report of the Philippines’ (30 November 2022), CCPR/C/PHL/CO/5, para. 38.

¹⁰ Caravana Filipina (2025), ‘Black Robes, Red Targets: Report of a Fact-Finding Mission on Extrajudicial Killing and other Gross Human Rights Violations against Legal Professionals in the Philippines between 2016 and 2023’. <https://www.lawyersforlawyers.org/wp-content/uploads/2025/06/CARAVANA-FILIPINA-2024-pages.pdf>

Society to Promote and Protect Universally Recognised Human Rights and Fundamental Freedoms (“UN Declaration on Human Rights Defenders”).¹¹

14. Article 9 of the Declaration affirms the right of everyone to “offer and provide professionally qualified legal assistance or other relevant advice and assistance in defending human rights and fundamental freedoms”, while Article 11 obliges States to ensure the right to the lawful exercise of one’s occupation or profession. These guarantees are reinforced by Article 12 of the Declaration, which requires States to take all necessary measures to protect human rights defenders against intimidation, harassment, retaliation, and other arbitrary actions arising from their legitimate activities.

15. During the Fourth Cycle of the Universal Periodic Review (UPR), the Philippines received 21 recommendations specifically related to the protection of human rights defenders, including lawyers; seven calling for an end to “red-tagging” and for reforms to legislation underpinning the “war on drugs” and anti-terrorism laws; and 21 addressing increased accountability for extrajudicial killings and other grave human rights violations affecting lawyers and human rights defenders.¹² A mid-term UPR report submitted by a number of the signatory organisations details how the Philippines has not adequately implemented the accepted recommendations.¹³ Authorities have failed to take action to ensure that lawyers can perform their professional duties freely, without intimidation, hindrance, harassment, or improper interference. Documented incidents of violence against legal professionals form part of a broader, systematic effort to suppress lawyers working to uphold human rights and the rule of law. Practices such as surveillance, intimidation, red-tagging, lawfare, and extrajudicial killings persist, creating a chilling effect that extends to the wider legal profession.

ACTIONS REQUESTED

16. We respectfully request that the Special Rapporteurs:
 - a. Raise the case of Atty. Rey Gorgonio with the Government of the Philippines as a matter of urgency;

¹¹ UN General Assembly, *Resolution No. A/RES/53/144*, 8 March 1999, <http://www.ohchr.org/EN/Issues/SRHRDefenders/Pages/Declaration.aspx> (accessed 5 February 2026).

¹² ‘PHILIPPINES: Mid-term Report - Review of the implementation of recommendations with respect to the rule of law and the role of lawyers partially accepted by Philippines during its Fourth UPR Cycle’ (January 2026). <https://www.lawyersforlawyers.org/wp-content/uploads/2026/01/Mid-term-UPR-Report-Philippines.pdf>

¹³ *Ibid.*

- b. Encourage the Philippine authorities to take immediate protective measures, in consultation with Atty. Gorgonio and relevant professional bodies, to ensure his safety and that of his colleagues;
- c. Urge the authorities to conduct a prompt, thorough, impartial and independent investigation into the death threats issued against him;
- d. Request detailed information from the Philippine authorities on the steps taken to investigate the threats and to protect legal professionals;
- e. Inform us in due course of any action taken by your mandates on this matter.

17. We thank you for your urgent attention to this matter and remain at your disposal for any further information or clarification.

Yours faithfully,



Mark Evans, President of the Law Society of England and Wales

On behalf of:

The Law Society of England and Wales

Institute for the Rule of Law of the Union Internationale des Avocats (UIA-IROL)

International Bar Association's Human Rights Institute (IBAHRI)

Council of Bars and Law Societies of Europe (Conseil des Barreaux Européens, CCBE)

European Association of Lawyers for Democracy and World Human Rights (ELDH)

Foundation Day of the Endangered Lawyer

Lawyers for Lawyers