

# ***Pro Bono Practices and Opportunities in the Philippines***

***Excerpt from: A Survey of Pro Bono Practices and Opportunities in Selected Jurisdictions***

September 2010

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Due to widespread poverty and a recent increase in human rights violations, the Philippines presents numerous opportunities for *pro bono* work.

## **I. *Legal Services and the Legal Profession in the Philippines***

The 1987 Philippine Constitution, established after a period of martial law declared by President Ferdinand E. Marcos in 1972 and lasting until 1986, provides the basis for the country's law.<sup>1</sup> It delineates the powers granted to the nation's Supreme Court, which, along with lower courts such as the Court of Appeals and regional trial courts, comprise the Philippine court system.<sup>2</sup> The Philippines also has a system known as the Katarungang Pambarangay, or Barangay Justice System ("BJS").<sup>3</sup> The BJS operates at the level of the barangay, which is a local government unit, similar to a town or village, and is based on traditions used to mediate local disputes.<sup>4</sup> It is run by appointed government officials, but has limited jurisdiction.<sup>5</sup> For example, it can only hear disputes arising between people in the same, or neighboring, barangays, and cannot hear criminal cases where the penalty exceeds certain limitations.<sup>6</sup> Shari'a Courts also exist and have jurisdiction in certain cases involving Muslim parties or arising under the Code of Muslim Personal Laws.<sup>7</sup> The Philippine legal system is unique because it combines civil law, common law, Muslim law, and indigenous law.<sup>8</sup> The Philippine Constitution states that Filipino is the country's national language, but both Filipino and English are official languages for the purpose of communication and instruction.<sup>9</sup>

Although the Philippines has remained a republic since 1986,<sup>10</sup> signs of government instability are evident. The current leader of the Philippines, President Gloria Macapagal-Arroyo, has been accused of rigging the country's 2004 national elections.<sup>11</sup> Further, in 2006, when the government claimed it foiled an attempted military coup,<sup>12</sup> she declared emergency rule, which allowed the government to use police and the military to maintain order.<sup>13</sup> In the past two decades, twelve coups have been attempted.<sup>14</sup>

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<sup>1</sup> Milagros Santos-Ong, Update: Philippine Legal Research § 3 (2009), *available at*: <http://www.nyulawglobal.org/globalex/Philippines1.htm>.

<sup>2</sup> *See id.* at § 3.3.

<sup>3</sup> Stephen Golub, *Non-state Justice Systems in Bangladesh and the Philippines: Paper Prepared for the United Kingdom Department for International Development* 12 (2003), *available at*: [www.gsdrc.org/docs/open/DS34.pdf](http://www.gsdrc.org/docs/open/DS34.pdf).

<sup>4</sup> *Id.*

<sup>5</sup> *Id.* at 12-13.

<sup>6</sup> *Id.* at 13.

<sup>7</sup> Santos-Ong, *supra* note 666, at § 3.

<sup>8</sup> *Legal System in Philippines*, <http://www.tradechakra.com/economy/philippines/legal-system-in-philippines-235.php> (last visited Oct. 7, 2010).

<sup>9</sup> Santos-Ong, *supra* Note 7 at § 1.

<sup>10</sup> *Id.* at § 3.

<sup>11</sup> Carlos H. Conde, *Emergency Rule in Philippines After Failed Coup is Cited*, N.Y. TIMES, Feb. 25, 2006.

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

Additionally, despite efforts towards peace, conflict continues between the Philippine government and the Communist Party of the Philippines.<sup>15</sup> The armed wing of the Communist Party of the Philippines (NPA) has been waging a guerilla campaign in the countryside for four decades.<sup>16</sup> Hostilities also remain between the Philippine government and Muslim separatist groups, such as the Moro National Liberation Front and Moro Islamic Liberation Front.<sup>17</sup> The country faces threats from domestic and foreign terrorist groups, including the Abu Sayyaf Group, a militant spin-off of the separatist groups, which has been implicated in a number of bomb attacks against civilians.<sup>18</sup> Further, in Davao City on the island of Mindanao, there are reports of a so-called “death squad,” originally set up to execute gang members and drug dealers without legal process.<sup>19</sup> The “death squad” is now reported to regularly assassinate, without trial, people who are merely suspected of petty crimes and those who have not committed any crimes at all, and these killings have been on the rise.<sup>20</sup> Finally, there is much concern over human rights violations and the killing of leftist activists in the Philippines.<sup>21</sup>

## II. *Legal Aid in the Philippines*

Widespread poverty in the Philippines<sup>22</sup> makes the provision of free legal aid particularly important. The Philippine Constitution and the Philippine Code of Professional Responsibility for Lawyers both reflect the principle that attorneys should provide legal representation to indigent individuals.<sup>23</sup> The Constitution states that, “Free access to the courts and quasi judicial bodies and adequate legal assistance shall not be denied to any person by reason of poverty.”<sup>24</sup> In a section entitled “A Lawyer Shall Not Refuse His Services to the Needy,” the Code of Professional Responsibility requires that absent, serious and sufficient cause to decline representation, lawyers must accept certain *pro bono* cases assigned to them.<sup>25</sup>

There are a number of government programs offering legal assistance to indigent persons in the Philippines. The Public Attorney’s Office (“PAO”), an agency under the Department of Justice, was established to provide free legal representation to individuals who either have no income or are below certain income thresholds in civil, criminal, and administrative cases.<sup>26</sup> The

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<sup>15</sup> Philip Alston United Nations Report of the Special Rapporteur on extrajudicial, summary, arbitrary executions 7 (2007), available at: <http://www2.ohchr.org/English/issues/executions/docs/AHRC8.doc>.

<sup>16</sup> *Troops Overrun Leftist Rebels’ Camp in Compostela*, PHILSTAR, Sept. 26, 2010.

<sup>17</sup> Alston, *supra* note 679.

<sup>18</sup> *See id.*; *see also* U.S. DEPARTMENT OF STATE, “Travel Warning,” [http://travel.state.gov/travel/cis\\_pa\\_tw/tw/tw\\_2190.html](http://travel.state.gov/travel/cis_pa_tw/tw/tw_2190.html) (last visited Sept. 30, 2010).

<sup>19</sup> WIKIPEDIA, [http://en.wikipedia.org/wiki/Davao\\_death\\_squads](http://en.wikipedia.org/wiki/Davao_death_squads) (last visited Sept. 30, 2010).

<sup>20</sup> Carlos H. Conde, *Philippine Death Squads Extend Their Reach*, N.Y. TIMES, Mar. 23, 2005; Human Rights Watch, *You Can Die Anytime: Death Squad Killings in Mindanao*, Part I (Apr. 2009), available at: <http://www.hrw.org/en/node/82034/section/2>.

<sup>21</sup> Carlos H. Conde, *Leftist Activist is Slain in Philippines*, N.Y. TIMES, July 5, 2010..

<sup>22</sup> U.S. DEPARTMENT OF STATE, <http://www.state.gov/r/pa/ei/bgn/2794.htm> (last visited Sept. 30, 2010).

<sup>23</sup> Code of Professional Responsibility, Canon 14, Rule 14.02.

<sup>24</sup> CONST. (1987), art. III, sec. 11 (Phil.).

<sup>25</sup> Code, *supra* note 687.

<sup>26</sup> *See* Carlos P. Medina, *Legal Aid Services in the Philippines*, available at: [http://www.pili.org/index.php?option=com\\_content&view=article&id=156&Itemid=95](http://www.pili.org/index.php?option=com_content&view=article&id=156&Itemid=95); PUBLIC ATTORNEY’S OFFICE, DEPARTMENT OF JUSTICE, <http://www.doj.gov.ph/agencies/pao.html> (last visited Sept. 30, 2010).

PAO, in its effort to fulfill “the constitutional mandate that ‘free access to courts shall not be denied by reason of poverty,’”<sup>27</sup> provides representation, as well as mediation and various other legal services.<sup>28</sup> Other government-based agencies provide free legal assistance regarding a specific area of the law, for example, the area of agrarian reform.<sup>29</sup> The Philippine courts may also appoint lawyers to provide free representation to indigent defendants in criminal cases.<sup>30</sup>

The Integrated Bar of the Philippines (“IBP”) also provides legal assistance to indigent Filipinos.<sup>31</sup> The IBP is a mandatory bar association that was created by the Philippine Supreme Court in the 1970’s.<sup>32</sup> All Philippine lawyers are required to join the IBP and cannot practice law in the Philippines without doing so.<sup>33</sup> The IBP describes itself as “semi-governmental,” or “a private organization endowed with certain governmental attributes.”<sup>34</sup> The IBP’s stated mission consists of three fundamental objectives: “1. To elevate the standards of the legal profession; 2. To improve the administration of justice; [and] 3. To enable the Bar to discharge its public responsibility more effectively.”<sup>35</sup> To meet the third objective, the IBP’s National Committee on Legal Aid runs the IBP Legal Aid Program, which includes 83 local legal aid committees throughout the Philippines.<sup>36</sup> This committee provides free legal counseling and advice to the those who qualify, and also drafts necessary documentation for them.<sup>37</sup> Free legal representation before the courts, quasi-judicial or administrative bodies, is provided to individuals who qualify for representation under “the double M tests,” which consider the means of the individual and the merits of the case.<sup>38</sup>

A variety of non-government entities, including private law firms, also provide free legal aid to indigent individuals and disadvantaged groups, and promote certain public interest causes.<sup>39</sup> Member organizations of a coalition called the Alternative Law Groups (“ALG”) provide free legal aid to poor and marginalized groups and communities in the Philippines, and seek to enable greater access to justice for these disadvantaged groups. They also engage in matters relating to public issues, such as the environment, gender equality and human rights.<sup>40</sup> ALG programs are generally aimed at promoting the pursuit of public interest, respect for human rights, and social justice. According ALG’s website, “[t]he practice of alternative or developmental law looks at

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<sup>27</sup> *Id.*

<sup>28</sup> Medina, *supra* note 690.

<sup>29</sup> *Id.*; DEPARTMENT OF AGRARIAN REFORM, <http://www.dar.gov.ph/freqaqs.html#4> (last visited Sept. 30, 2010).

<sup>30</sup> Medina, *supra* note 690.

<sup>31</sup> *Id.*

<sup>32</sup> IBP HISTORY., <http://ibp.ph/history.html> (last visited Sept. 30, 2010).

<sup>33</sup> *Id.*

<sup>34</sup> *Id.*

<sup>35</sup> IBP MISSION, <http://ibp.ph/mission.html> (last visited Sept. 30, 2010).

<sup>36</sup> IBP LEGAL AID PROGRAM, <http://ibp.ph/lap.html> (last visited Sept. 30, 2010).

<sup>37</sup> *Id.*

<sup>38</sup> *Id.*

<sup>39</sup> See Baker & McKenzie, Working in the Philippines, <http://www.bakermckenzie.com/careers/philippines/> (last visited Oct. 1, 2010); CHAN ROBLES LAW FIRM, Pro-Bono, [http://www.chanrobles.com/pro\\_bono.php](http://www.chanrobles.com/pro_bono.php) (last visited Sept. 30, 2010); Medina, *supra* note 690.

<sup>40</sup> THE ALTERNATIVE LAW GROUPS, <http://www.alternativelawgroups.org/about.asp?sec=index> (last visited Sept. 30, 2010); Medina, *supra* note 690.

conditions, incidents and other legal matters or issues from a structural perspective . . . and merges law and the social sciences.”<sup>41</sup> The work of the participating organizations includes impact litigation, policy reform efforts, education initiatives to inform marginalized groups about their legal rights and concerns, and an effort to create groups of paralegals in communities and organizations which can provide legal assistance from within.<sup>42</sup> Member groups of the coalition often maintain relationships with law schools to carry out their objectives.<sup>43</sup>

Law students have also played a role in providing legal services. In the Philippines, law students who have completed a required amount of study and are supervised in a clinical legal education program may represent clients without compensation in civil, criminal, or administrative cases.<sup>44</sup> A number of Philippine law schools, including the Ateneo de Manila Law School in Makati City, have set up clinical programs through which their students provide free legal assistance.<sup>45</sup> Foreign law schools have also provided assistance. In 2007, students from the Osgoode Hall Law School of York University in Canada traveled to the Philippines as part of an effort to provide *pro bono* legal assistance to developing nations.<sup>46</sup>

### III. *Human Rights Pro Bono Opportunities*

The area of human rights is ripe for *pro bono* work in the Philippines. Domestically, the Philippine Constitution includes a section prioritizing the protection of human rights.<sup>47</sup> Also, the Philippine Revised Penal Code criminalizes various violations of human rights.<sup>48</sup>

Internationally, the Philippines is also a party to various treaties that require a commitment to protecting human rights. The Philippines has signed the International Covenant on Civil and Political Rights (ICCPR),<sup>49</sup> a binding treaty that requires signatory countries to protect human rights, including the right to life and the right to be free from torture.<sup>50</sup> The Philippines is also a signatory of the Geneva Conventions of 1949 and the Second Additional Protocol to the Geneva Conventions, both of which set standards for international humanitarian law.<sup>51</sup>

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<sup>41</sup> THE ALTERNATIVE LAW GROUPS, “The History of ALG,” <http://www.alternativelawgroups.org/about.asp?sec=history> (last visited Sept. 30, 2010).

<sup>42</sup> THE ALTERNATIVE LAW GROUPS, “What We Do,” <http://www.alternativelawgroups.org/whatwedo.asp?sec=index> (last visited Sept. 30, 2010).

<sup>43</sup> THE ALTERNATIVE LAW GROUPS, “Members of ALG,” <http://www.alternativelawgroups.org/members.asp?sec=mem> (last visited Sept. 30, 2010).

<sup>44</sup> Medina, *supra* note 690.

<sup>45</sup> *Id.* See ATENEO DE MANILA LAW SCHOOL, <http://law.ateneo.edu/index.php?p=82> (last visited Sept. 30, 2010).

<sup>46</sup> *Osgoode Students Provide Pro Bono Legal Service in the Philippines*, FILE, <http://www.yorku.ca/yfile/archive/index.asp?Article=8607> (last visited Sept. 30, 2010). While there, they hosted a forum addressing the legal issues regarding the Philippine’s worst oil spill.

<sup>47</sup> Const. (1987), art. XIII, (Phil.).

<sup>48</sup> The Revised Penal Code criminalizes arbitrary detention, delay in delivery of detained persons to the proper judicial authorities, dissolution of peaceful meetings, maltreatment of prisoners, homicide, and kidnapping, among other human rights violations. REVISED PENAL CODE, Act No. 3815, Art. 124, 125, 131, 235, 249, & 267, Act No. 3815, as amended (Phil.).

<sup>49</sup> U.N.H.C.R., *supra* note 712, at ¶ 4.

<sup>50</sup> International Covenant on Civil and Political Rights art. 6, 7, Dec. 16, 1966, 999 U.N.T.S. 171.

<sup>51</sup> U.N.C.R., *supra* note 712, at ¶ 4.

## A. Extrajudicial Executions

Extrajudicial executions have been a significant problem in the Philippines. Amnesty International defines extrajudicial executions as “unlawful, deliberate killings carried out by order of a government or with its complicity or acquiescence.”<sup>52</sup> The Philippines has experienced an unprecedented surge in these executions since 2005,<sup>53</sup> prompting extensive investigations since then by the United Nations (“U.N.”), Amnesty International, and Human Rights Watch.<sup>54</sup>

In the Philippines, these illegal killings have primarily been carried out by the military,<sup>55</sup> and have targeted a large number of leftist activists, human rights advocates, labor organizers and journalists.<sup>56</sup> The latest Human Rights Watch World Report on the Philippines declared that “[h]undreds of leftist politicians, political activists, journalists, and outspoken clergy have been killed or abducted since 2001. So far only 11 people have been convicted for these extrajudicial killings, two in 2009 [and] [n]o member of the military active at the time of the killing has been brought to justice for such crimes.”<sup>57</sup> As mentioned earlier, the death squads in Davao City in Mindanao are believed to be responsible for a rise in targeted killings: 2 in 1998; 98 in 2003; 124 in 2008; and, in 2009, 33 reported killings in January alone.<sup>58</sup> Although the exact number of killings in the past years is unclear, the effects have been extremely deleterious.<sup>59</sup>

Among the main obstacles to addressing the problem of extrajudicial killings has been the steps taken by the government. When government investigations do actually take place, they do not meet the international standards set forth by the U.N. for such inquiries.<sup>60</sup> These ineffective investigations, along with witness intimidation and lack of political will to prosecute suspects, have created a “culture of impunity.”<sup>61</sup> The U.N. Special Rapporteur found the systematic

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<sup>52</sup> AMNESTY INTERNATIONAL, *Philippines: Political Killings, Human Rights and the Peace Process* 3 (2006), available at: <http://www.amnesty.org/en/library/asset/ASA35/006/2006/en/6d1f080e-f774-11dd-8fd7-f57af21896e1/asa350062006en.pdf>.

<sup>53</sup> Seth Mydans, *Rights Groups Say Military Is Behind Killings in Philippines*, N.Y. TIMES, Aug. 25, 2006 (stating that there has been an increase from 2005 to 2006); U.N.H.R.C. Special Rapporteur, *Report of the Special Rapporteur on extrajudicial, summary or arbitrary executions, Philip Alston*, p 3, U.N. Doc. A/HRC/8/3/Add.2 (Apr. 16, 2008).

<sup>54</sup> *Id.* The Human Rights Watch has released several reports in January 2007, June 2007, July 2007, April 2009, January 2010, and April 2010. The Amnesty International has released reports in 2006, 2007, 2008, and 2009.

<sup>55</sup> Both the U.N. Special Rapporteur and a commission created by the Philippine president concluded that the military is to blame for the killings. See Veronica Uy, *UN Exec to RP: Admit Extrajudicial Killings are Happening*, INQUIRER.NET, Feb. 21, 2007; N.Y. TIMES, *Philippine Military is Linked to Killings*, N.Y. TIMES, Feb. 23, 2007; Carlos H. Conde, *Rights Group Accuses Philippine Army of Abuses Against Leftists*, N.Y. TIMES, June 29, 2007.

<sup>56</sup> See U.N.H.C.R., *supra* note 712, 713; Amnesty International Report (April 2009) available at: <http://www.amnesty.org/en/region/philippines/report-2009#>.

<sup>57</sup> Human Rights Watch, *World Report Chapter: Philippines*, ¶ 2 (Jan. 2010), available at: [http://www.hrw.org/sites/default/files/related\\_material/philippines\\_0.p](http://www.hrw.org/sites/default/files/related_material/philippines_0.p).

<sup>58</sup> Human Rights Watch, *You Can Die Anytime: Death Squad Killings in Mindanao*, Part I (Apr. 2009), available at: <http://www.hrw.org/en/node/82034/section/2>.

<sup>59</sup> U.N.H.C.R., *supra* note 712 at p 2 (The U.N. Special Rapporteur reported that these executions have, “eliminated civil society leaders, . . . intimidated a vast number of civil society actors, and narrowed the country’s political discourse.”).

<sup>60</sup> Amnesty International, *supra* note 715.

<sup>61</sup> *Id.*

intimidation and harassment of potential witnesses to be particularly problematic, suggesting that 80% of strong cases may fail to move from the initial investigation to actual prosecution as a result.<sup>62</sup>

Further compounding the situation, the government has restricted freedom of speech and the press by attempting to control the media. The government places pressure on journalists by issuing warnings to them; placing them on watch lists and under surveillance; and threatening to sue them, arrest them, and charge them with sedition.<sup>63</sup> Additionally, the director of the national police force has told news outlets that they must conform to unspecified standards for reporting, which the government will interpret on a case-by-case basis.<sup>64</sup> Finally, the government has attempted to exert influence over the media in other ways. In February 2006, when President Gloria Macapagal-Arroyo declared emergency rule,<sup>65</sup> she claimed she could take over media outlets if necessary.<sup>66</sup> This burden on freedom of speech and the press helps to perpetuate the cycle of impunity; it is dangerous for journalists to ever suggest government or military involvement in the killings.

## B. Current Efforts and Opportunities to Protect Human Rights

In addition to the investigations by prominent international human rights organizations such as the U.N., Amnesty International and Human Rights Watch, other smaller organizations have also engaged in both research and service projects aimed at protecting human rights in the Philippines.

For example, the Center for Constitutional Rights, based in New York, has collaborated with GABRIELA Network, an organization that works in support of women's human rights both in the U.S. and the Philippines. The Asia Foundation, funded in part by the United States Agency for International Development, has also run numerous programs, including a project to train judges and prosecutors in an effort to develop a more accountable judiciary<sup>67</sup>, and a project to increase confidence in election results, which included creating a voter's guide and bringing in election monitors.<sup>68</sup> Additionally, the National Union of Peoples' Lawyers was recently formed by Romeo Capulong, a prominent human rights lawyer and judge serving on the U.N. Tribunal for the Former Yugoslavia.<sup>69</sup> It is a voluntary association of human rights lawyers who are working together to defend, protect, and promote human rights in the Philippines by engaging in litigation on behalf of victims of human rights violations, organizing concrete programs to protect lawyers who are threatened or attacked, and advocating other types of reform.<sup>70</sup>

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<sup>62</sup> U.N.H.C.R., *supra* note 712 at ¶ 52, 40 (reporting that the climate of impunity is so pervasive that the operatives who carry out the killings often do not wear masks to hide their identities).

<sup>63</sup> *Id.* at ¶ 40.

<sup>64</sup> Seth Mydans, *The Philippines Wages a Campaign of Intimidation Against Journalists*, N.Y. TIMES, April 3, 2006.

<sup>65</sup> *Id.*

<sup>66</sup> *Id.*

<sup>67</sup> THE ASIA FOUNDATION, *Philippines Overview*, <http://www.asiafoundation.org/Locations/philippines.html>.

<sup>68</sup> *Id.*

<sup>69</sup> THE NATIONAL UNION OF PEOPLES' LAWYERS, <http://www.nupl.net/about.php> (last visited Oct. 1, 2010).

<sup>70</sup> *Id.*

#### IV. *Other Pro Bono Opportunities*

There are also opportunities to do *pro bono* work in other areas, such as environmental law. In 2010, a *pro bono* environmental lawyer helped Philippines climate change activists take their fight against flooding to the country's supreme court.<sup>71</sup> The lawyer, along with Global Legal Action on Climate Change (GLACC), sought to compel the government to implement two existing laws that could ease flooding, which is a common problem in the Philippines.<sup>72</sup> The organization sought a remedy under the Writ of Kalikasan, which is "the first legal weapon in the world that empowers the man on the street to seek concrete actions for ecological protection from their government officials."<sup>73</sup> Under this writ, the court can issue a *writ of mandamus* commanding the government to execute laws already on the books.<sup>74</sup> This significant tool shows the potential for future environmental *pro bono* work in the Philippines, as well as possibilities in other *pro bono* areas.

#### V. *Potential Barriers to Pro Bono Work*

As in any developing country with an intermittently unstable government, attorneys may experience some barriers to performing *pro bono* legal services in the Philippines.

First, because the government limits freedom of speech and the press in certain situations,<sup>75</sup> attorneys may have difficulty publicizing their availability to assist on a *pro bono* basis to those in need.

Second, the government has previously shown that it may not be hospitable to certain types of *pro bono* work. In December 2006, an attorney from the International Labor Rights Fund, who had investigated the killings of union leaders, was barred from entering the country.<sup>76</sup> Evidence also suggests that other lawyers and activists are currently or have previously been "blacklisted" from entering the country.<sup>77</sup>

This is also illustrative of Philippine resistance to allow foreign law firms to enter the market. It is difficult for foreign firms to offer *pro bono* services, since non-Filipino lawyers are not permitted to offer advice on Philippine, law and foreign law firms are not allowed to have

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<sup>71</sup> Purple S. Romero, *Pro Bono Lawyer Leads Landmark Court Challenge in Philippines*, TrustLaw, June 29, 2010 available at: <http://www.trust.org/trustlaw/news/pro-bono-lawyer-leads-landmark-court-challenge-in-philippines/> (last visited Oct. 7, 2010).

<sup>72</sup> *Id.*

<sup>73</sup> *Id.*

<sup>74</sup> *Id.*

<sup>75</sup> U.N.H.C.R., *supra* note 712; INTERNATIONAL NEWS SAFETY INSTITUTE, *Threats Faced by Filipino Journalists*, [http://www.newssafety.org/index.php?view=article&catid=144%3Aphilippines-media-safety&id=3818%3Aphilippines-threats-faced-by-filipino-journalists&option=com\\_content&Itemid=100435](http://www.newssafety.org/index.php?view=article&catid=144%3Aphilippines-media-safety&id=3818%3Aphilippines-threats-faced-by-filipino-journalists&option=com_content&Itemid=100435) (last visited Oct. 1, 2010).

<sup>76</sup> See HUMAN RIGHTS WATCH, *Philippines: Government Bans Its Critics From Entering*, <http://www.hrw.org/en/news/2008/10/29/philippines-free-labor-rights-lawyer> (last visited Oct. 1, 2010).

<sup>77</sup> *Id.* However, in February of 2007, the government allowed a U.N. Special Rapporteur to enter the country to investigate the killings. See U.N.H.C.R., *supra* note 712. (Press Statement available at: <http://www.unhchr.ch/hurricane/hurricane.nsf/view01/7B6094F7150CDC99C125728A003B12B1?opendocument>)



offices in the Philippines.<sup>78</sup> Also, very few domestic law firms have associations with large foreign firms, with the notable exception of Baker & McKenzie, which has a formal arrangement with the local firm, Quisumbing Torres.<sup>79</sup> The difficulty for foreign law firms to work with local firms or establish a presence themselves translates into difficulties for *pro bono* opportunities as well.

## VI. *Conclusion*

There is a great need for *pro bono* legal assistance in the Philippines. Because of the potential barriers to providing such assistance, the best opportunities may be found by reaching out to, and joining forces with, groups that have already worked in, or are knowledgeable about, the Philippines.

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<sup>78</sup> ASIA LAW, *Asialaw Market Survey: Asia's Best Local Law Firms*, <http://www.asialaw.com/Article/1971349/Search/Results/Asialaw-Market-Survey-Asias-Best-Local-Law-Firms.html?Keywords=Law+Firm+Poll+China+India+Indonesia+Malaysia+Philippines+South+Korea> (last visited Oct. 7, 2010).

<sup>79</sup> *Id.*