

**Mandate of the Special Rapporteur on extrajudicial, summary or arbitrary executions**

REFERENCE:  
AL PHL 7/2018

1 June 2018

Excellency,

I have the honour to address you in my capacity as Special Rapporteur on extrajudicial, summary or arbitrary executions pursuant to Human Rights Council resolution 35/15.

In this connection, I would like to bring to the attention of your Excellency's Government information I have received concerning the alleged **drug-related arbitrary killing of 25 individuals**.

According to the information received:

**Case of Michael Aquino Cardente, 46 years old, resident of Sitio Casiluyan, Barangay Balbagon, Municipality of Moalboal, Province of Cebu**

Mr. Cardente was a suspected drug pusher. The police listed him as the seventh most wanted drug-related personality in his town. Early in the morning of 12 September 2016, unidentified members of the Philippine National Police surrounded Mr. Cardente's house in Sitio Casiluyan. Some of the officers wore civilian clothes. Two policemen forcibly entered the house with their guns aimed at Mr. Cardente and his live-in partner. The policemen ordered them out of the house. Once they went outside, two policemen approached Mr. Cardente and pulled him back into the house. Two gunshots were heard afterwards. Mr. Cardente was shot twice in the chest and in the face. He was taken to Badian District Hospital and declared dead on arrival. The authorities did not investigate the event.

**Case of Antonio Benson Saga, 34 years old, resident of Barangay 3 Poblacion, Tanjay City, Province of Negros Oriental**

Mr. Saga was a suspected drug user and pusher, listed as a "high value target" by narcotics authorities. In the early hours of 9 April 2017, officers of the Tanjay City Police, the Provincial Public Safety Company, the Philippine Drug Enforcement Agency, the Provincial Intelligence Bureau/Special Operation Group and the Provincial Drug Enforcement Unit targeted Mr. Saga in a buy-bust operation. A police officer explained to the victim's father that during the operation, Mr. Saga attempted to flee from the police on a motorcycle, pulled out a gun and fired at them. This forced the police to fire back at him. Mr. Saga was shot five times at close range. The police also recovered shabu, drug paraphernalia, and pistols with three live bullets in them. The father refused to believe the official explanation of the incident because when he arrived at the

scene of the killing, he saw his son's motorcycle parked near his body. The authorities did not investigate the event.

**Case of Jerry Durano Puno, 43 years old, resident of Sitio Cogon, Barangay Guinsay, Danao City, Province of Cebu**

Mr. Puno was a suspected drug pusher, listed on the town's drug watch list. On 14 May 2017, two unidentified armed men wearing civilian clothes and face masks shot and killed him outside of his house in Sitio Cogon, Barangay Guinsay, Danao City. According to the victim's wife, her husband went outside to urinate. She heard the noise of a motorcycle stopping by, followed by multiple gunshots. When she went outside, Mr. Puno was lying on the ground with bullet injuries and rushed him to Cebu Provincial Hospital, Danao City, Cebu where he arrived dead. According to a witness, two men on a motorbike stopped nearby Mr. Puno, and the passenger shot Mr. Puno multiple times. The victim sustained four gunshot wounds. The authorities did not investigate the event.

**Case of Florentino Tiro, 34 years old, resident of Purok Cansubing, Barangay Day-as, Municipality of Cordova, Province of Cebu**

Mr. Tiro was a suspected drug pusher included in the high value target list in Cordova. On 5 June 2017, the Cordova Police raided and searched Mr. Tiro's house. The police did not find any illegal item in his possession and did not arrest him. The next day, the police targeted Mr. Tiro in a buy-bust operation and, as a result, detained him with two other individuals. While these individuals were let go, Mr. Tiro was kept with his hands raised and shot multiple times. He sustained six gunshot wounds to his knees and both sides of his chest. He was taken to Lapulapu City District Hospital and declared dead on arrival. The police recovered six sachets of shabu and a .357 caliber pistol with two bullets. The authorities did not investigate the event.

**Case of Paul Ramil Dianon Nepomuceno, 47 years old, resident of Barangay Basdiot, Municipality of Moalboal, Province of Cebu**

Mr. Nepomuceno was a suspected drug pusher included in the list of drug traffickers in Moalboal town. On 12 June 2017, unidentified members of the police of Moalboal approached Mr. Nepomuceno while he was playing mahjong in Sitio Tunggo, Barangay Basdiot, Moalboal, Cebu. According to a witness, the policemen grabbed Mr. Nepomuceno, took him outside and shot him several times. Mr. Nepomuceno tried to run but eventually collapsed. The policemen took him to Badian City District Hospital, where he was declared dead on arrival. Mr. Nepomuceno sustained six gunshot wounds, two in his right shoulder and four in his stomach. The police recovered .45 caliber pistols with four live ammunitions, seven small sachets of shabu, and shabu paraphernalia. The victim's family denied allegations. An unidentified Moalboal Police investigator visited the victim's family and made them sign a waiver attesting that they were no longer

interested in filing a complaint. The authorities reportedly did not investigate the event.

**Case of Benny Fernandez Jr., 33 years old, resident of Barangay Candabong, Alcantara; and Marlon Lamusao, 33 years old, resident of Barangay Poblacion, Municipality of Alcantara, Province of Cebu**

Fernandez and Lamusao were suspected drug pushers. On 22 June 2017, unidentified members of the Special Weapons and Tactics Team and the Police of Alcantara surrounded Mr. Fernandez's house at Barangay Candabong, Alcantara, Cebu. They wore bullet proof vests over their civilian clothes. According to witnesses, two policemen forcefully entered the house and forced Mr. Fernandez and his friend, Mr. Lamusao, out of the house. One of the officers shot them. They were taken to Badian District Hospital, where they were declared dead on arrival. The authorities did not investigate the event.

**Case of Isidro "Sidro" Lorona, Sr., 56 years old and his son Isidro "Poloy" Lorona, Jr., 36 years old, residents of Barangay Poblacion, Municipality of Liloan, Province of Southern Leyte**

Mr. Sidro Lorona and Mr. Poloy Lorona were suspected drug pushers included in the "high value target" list in Southern Leyte. In July 2016, they voluntarily surrendered to Liloan Police Station. On 28 June 2017, the Baybay City Police and the Regional Drug Enforcement Unit targeted Mr. Sidro Lorona in a buy-bust operation and killed him and his son. A policeman told a person associated with Mr. Sidro Poloy that one of the victim tried to pull his gun out, forcing the police to shoot him and his son. However, according to a witness, Mr. Sidro Lorona and his son were approached on Trenta Desyembre Street, by two vehicles that blocked their way. Several unidentified armed men with bulletproof vests over their civilian clothes exited the vehicles and, aiming their guns at the father and the son, ordered them to step down from the motorcycle and lay on the ground. They then opened fire on them. Mr. Sidro Lorona sustained 30 gunshot wounds all over his body, while his son sustained 12 gunshot wounds to his chest. The police recovered packs of shabu and .38 caliber pistols. The authorities did not investigate the event.

**Case of Frederick "Weng weng" Villamala, 35 years old, resident of Barangay Sambag 2, Cebu City, Province of Cebu**

Mr. Villamala was a suspected drug pusher included in the list of "high value target personalities" of the city. In October 2016, Mr. Villamala voluntarily surrendered himself to the Cebu City police. On 9 July 2017, Mr. Villamala was with his wife and three other persons inside a red service vehicle in front of a convenience store at Private Street, Barangay Sambag 1, Cebu. Two white vans arrived and four unidentified men wearing balaclavas and bulletproof vests over civilian clothes exited and approached them. The victim's wife heard a voice

telling them to get down, which was followed by three gunshots. All three shots hit Mr. Villamal, twice in the back and once in the head. The wife screamed for help and one of the men pointed his gun at her. She and the accompanying persons were forced out of their car into the white vans, which took them to the office of the Philippine Drug Enforcement Agency in region 7, Cebu. The authorities did not investigate the event.

**Case of Jose Sebalda Dulay, 35 years old, resident of Barangay Apopong, General Santos City**

On 5 August 2017, Mr. Dulay was sitting by his house with his mother. The mother heard a loud bang, but thought it came from a tire that exploded. She then noticed that Mr. Dulay was slowly falling to the side. The mother tried to wake him up, but he was not responding. She called her other son who was inside the house for help. Both thought that Mr. Dulay fainted because of a heart attack. Neighbors then came and asked if they heard gunshots. The brother checked Mr. Dulay's body and saw a hole on his shirt. He called over a local official to ask for a vehicle to take Mr. Dulay to a hospital. The official took off Mr. Dulay's shirt and saw three gunshot wounds that did not bleed. Mr. Dulay was dead at this point. The police investigated the crime scene but did not recover any bullets. They advised the family to perform an autopsy on Mr. Dulay's body, but the family could not afford it. During the investigation, the police recovered a roll of foil from Mr. Dulay's house and asked the mother if he was a drug user. She explained that Mr. Dulay used drugs five years before and that he had stopped since then. The police identified an individual as the possible author of the killing. The arrest is, however, pending some additional information from the victim's family. Mr. Dulay's friends who were involved in drugs were all killed and he was the last of this group to be killed.

**Case of Brando Liquit Arcamo, 34 years old, resident of Barrio Obrero, Dadiangas North, General Santos City**

On 6 August 2017, Mr. Arcamo was grilling barbeque when an unidentified person shot him in the chest. CCTV footage from a nearby establishment captured the incident and showed two persons quickly leaving the crime scene on a motorcycle after the shooting. Mr. Arcamo was immediately taken to the Diagan Hospital but died on the way. The police investigated the killing and concluded that the murder may have been drug-related. Mr. Arcamo's family rejected that conclusion. According to them, Mr. Arcamo was not involved in any illegal activity.

**Case of Raquel Degamo Nuñez, 45 years old, resident of Barangay Poso Poblacion, Municipality of Cordova, Province of Cebu**

Mr. Nuñez was a suspected drug pusher included in the town's drug watch list. On 6 August 2017, Mr. Nuñez was arrested at a police checkpoint in Barangay

Subang Dako, Mandaue City, Cebu, on drug related charges. Mr. Nuñez reported that the police beat him and asked him to reveal the location of “the stuff.” He worried that they would kill him. On 19 August 2017, he was found dead in his cell in the Male Dormitory of Mandaue City Jail. The official cause of death was a blunt traumatic injury to his head. The City jail’s administration investigated the event. Thus far, no information is available on the outcome of these investigations.

**Case of Ryan “Ian” Redoble, 34 years old, resident of Sitio Sioux, Barangay East Poblacion, Municipality of Moalboal, Province of Cebu**

Mr. Redoble was a suspected drug pusher included in the town’s list of “high value targets”. On 8 August 2017, unidentified members of the Moalboal Police Station and Provincial Public Safety Company surrounded Mr. Redoble’s house in Sitio Sioux, Barangay East Poblacion, Municipality of Moalboal, Cebu. Three of the operatives wore civilian clothes and balaclavas covering their faces. According to witnesses, the three operatives forced their way into Mr. Redoble’s house and shot him immediately after finding him in the back of the house. The police took Mr. Redoble to Badian District Hospital, but he was declared dead on arrival. The authorities did not investigate the event.

**Case of Jerome Cañedo, 38 years old, resident of Barangay Lipat, Municipality of Minglanilla, Province of Cebu**

Mr. Cañedo was a suspected drug pusher. On 21 August 2017, two unidentified individuals arrived on a motorcycle to a garage named Hengs Motor Parts where Mr. Cañedo was working. They shot him in the head and in the mouth. He was subsequently taken to Minglanilla District Hospital and declared dead on arrival. The authorities did not investigate the event.

**Case of Bernard Gunther Buaya Abecia, 27 years old, resident of Sitio Lutaw, Barangay Tuble, Moalboal**

Mr. Abecia was a suspected drug pusher included in the “high value target” list in his town. On 31 August 2017, unidentified members of the Municipal Drug Enforcement Team and Provincial Public Safety conducted a buy-bust operation targeting Mr. Abecia in his house at Sitio Lutaw, Barangay Tuble, Moalboal. The members of the team wore civilian clothes. Witnesses heard gun shots after the police arrived. Mr. Abecia’s family members attempted to enter his house but were blocked by police officers. Soon after, policemen carried Mr. Abecia’s body out of the house and placed it into a car. He was taken to Badian District Hospital and declared dead on arrival. He sustained six gunshot wounds, one to his head and five to his chest. The police allegedly recovered 3.2 grams of shabu and a .45 caliber pistol with six live ammunitions and an empty shell at the crime scene. The authorities did not investigate the event.

**Case of Frederick Libongcogon Fondador, aka Jok Jok, 40 years old, resident of Employees Village, Barangay Fatima, General Santos City**

On 3 September 2017, two unidentified individuals riding a motorcycle shot and killed Mr. Fondador outside of his motor shop in Block 4, Zone 8 Barangay Fatima, General Santos City. Relatives of Mr. Fondador had heard rumors that Mr. Fondador was being targeted. Accordingly, Mr. Fondador was recommended to “lay low” and temporarily close the motor shop. Mr. Fondador followed the advice. His family also suggested that he should surrender himself to police, but he refused, maintaining that he committed no crime. Mr. Fondador’s wife claimed that he never used or handled drugs. Previously, on 22 August 2017, Mr. Fondador told his mother-in-law that his name had been cleared by the local police, but not by the Camp Fermin Lira of General Santos City Police Office. The General Santos City Police investigated the killing. Thus far, no information is available on the outcome of the investigations.

**Case of Peter Jake Hinalog Panis, 38 years old, resident of Lower Matibay, Tusaville, San Isidro, General Santos City**

On 4 September 2017, Mr. Panis was shot by unidentified individuals at Yumang Street, Boundary of Barangay San Isidro and City Heights, General Santos City, while driving his tricycle. The victim was immediately brought to Mindanao Medical Center but was dead on arrival. Mr. Panis’s mother admitted that he used drugs when he was a teenager but he had not been using any for many years. Following the advice of a local official, the victim had checked with the police whether he had been put on their watch-list and was informed that he hadn’t. The authorities investigated the killing. Thus far, no information is available on the outcome of the investigations.

**Case of Reynald Fuentesbella Estrada, 37 years old, resident of Barangay Mabuhay, General Santos City**

On 10 September 2017, two unidentified men wearing facemasks arrived at Mr. Estrada’s residence on a motorcycle. According to the victim’s father who was at the scene, one of the men went to Mr. Estrada’s apartment and asked if his name was “Boyot.” Mr. Estrada answered that his nickname was “Langgit.” The man then shot Mr. Estrada twice, once in the face and once in the chin. He died on the spot. The two men then left on their motorcycle. The victim’s nephew and nieces aged three to five witnessed the incident. The police and the Scene of the Crime Operatives investigated the murder and said they had found two bags of shabu inside the victim’s pocket. According to the family Mr. Estrada was only wearing leggings when he was killed. The authorities investigated the event. Thus far, no information is available on the outcome of the investigations.

**Case of Florante Abalos Saligumba, 41 years old, resident of Barangay Apopong, General Santos City**

On 19 September 2017, a man on a motorcycle stopped near Mr. Saligumba and shot him in the back of his head. Mr. Saligumba died on the spot and the gunman fled. An hour after, the police and Scene of the Crime Operatives investigate the killing. The victim's wife claimed that Mr. Saligumba was not involved in drug trafficking and that both were simple hawkers selling kitchen utensils. The victim sometimes worked as a bet-taker in cock-fights. The police investigated the event. Thus far, no information is available on the outcome of the investigations.

**Case of Romeo Montallan Montes, Jr., 33 years old, resident of Barangay Fatima, General Santos City**

On 25 September 2017, an unidentified gunman shot and killed Mr. Montes in Purok 16, Block 10, Barangay Fatima, General Santos City. The victim was playing cards with his neighbors when an unidentified man wearing a balaclava patted Mr. Montes on the shoulder. Mr. Montes ignored the man and continued playing. Suddenly, the man pulled out a gun and shot the victim in the head. The assailant left the area on a motorcycle with three other unidentified persons. The police suspected that Mr. Montes was a drug dealer. He also faced a criminal case, but did not know on what charges. He and his father had been investigated by police officers from Camp Fermin Lira but subsequently released. The authorities investigated the event. Thus far, no information is available on the outcome of the investigation.

**Case of Brothers Jerome Umpad, 27 years old, John Vincent Umpad, 26 years old, and Ruben Umpad, 25 years old, temporary residents in the Cebu International Convention Center (CICC), Barangay Guizo, Mandaue City, Province of Cebu**

On 2 October 2017, unidentified members from Mandaue Police Station 3 surrounded the tent house of the Umpad brothers at the CICC compound in Barangay Guizo, Mandaue City, Cebu. The brothers' mother recalled that she, her daughter, other residents of the tent and her three sons were asleep when policemen broke into their tent with guns pointed at them. The policemen ordered everyone but the brothers to leave the tent. When they did, the mother heard six shots. She then saw the police carrying her three sons, wrapped in blankets, into a police car. They were taken to the Mandaue City District Hospital and declared dead on arrival. The police questioned the mother about her son's involvement in the drug trade. She denied the accusations. The brothers were shot three days after the Supreme Court released them from prison, where they had served six years for murder. The Commission on Human Rights is investigating the event. The Mandaue City government did not take any action in this respect.

**Jan Raphael Diezon Eco, 22 years old, resident of Barangay Dadiangas South, General Santos City**

On 2 October 2017, Mr. Eco was shot during a buy-and-bust operation conducted by eight members of the City Drug Enforcement Unit (CDEU) in Tionson Street, Barangay Lagao, General Santos City. According to the police, Mr. Eco attempted to flee from the police when he noticed that they saw him selling shabu. During the chase, CDEU officers alleged that Mr. Eco tried to reach for something, and they shot him. Mr. Eco was taken to a hospital with gunshot wounds to his back and the side of his head. He died the day after. The victim's family rejected the police explanation of the events. According to the victim's father, Mr. Eco did not use drugs and passed a civil service examination in 2017 and planned to apply at the Bureau of Fire and Protection. Further, the father explained that during the time of the alleged drug sale, Mr. Eco was supposed to be on his way to fetch his mother from the clinic where she worked. Moreover, a witness told the father that CDEU asked him to sign a document indicating that one sachet of shabu and a cellphone were found at the crime scene. Later, the CDEU asked him to sign a new version of the document that indicated that four sachets of shabu, marijuana, and a gun were found. The witness refused, since he already signed the first document. The Philippines National Police of General Santos City reportedly investigated the event. Thus far, no information is available on the outcome of the investigations.

In connection with the above alleged facts and concerns, please refer to the **Annex on Reference to international human rights law** attached to this letter which cites international human rights instruments and standards relevant to these allegations.

I am seriously concerned that these allegations point to a pattern of unnecessary and disproportionate use of force by law enforcement officials against persons suspected of involvement in drug consumption or trafficking. None of the victims appear to have attempted to resist or to threaten or attack the police or other perpetrators of the killings. From the information available to me, no attempt appears to have been made to arrest the victims, charge them with specific offenses, and try them. The killings described took place outside any form of judicial proceeding. I am concerned that they seem to constitute *prima facie* extrajudicial, arbitrary or summary executions, in contravention to Article 3 of the Universal Declaration of Human Rights (UDHR) and Article 6 (1) of the International Covenant on Civil and Political Rights (ICCPR), ratified by the Philippines on 23 October 1986. Article 6 of the ICCPR guarantees the right of every individual to life and provides that this right shall be protected by law and that no one shall be arbitrarily deprived of his or her life.

I understand that some of the individuals of the present communication were among an estimated total of 42,000 names identified in Government's drug lists. I am thus concerned that the individuals whose name appear in these lists may be further targeted for arbitrary killing. I also wish to reiterate my deep concern at the Government's alleged lack of steps to effectively deter and prevent these killings. Likewise, I am deeply concerned that alleged extrajudicial executions carried by police forces are not investigated, while those allegedly perpetrated by non-State actors remain unsolved, indicating that they may be the result of a deliberate policy.



Lastly, I wish to reiterate my view, shared with the Government in earlier communications that existing empirical evidence shows that excessively violent repressive drug enforcement policies only contribute to and worsen existing violent criminal drug markets.

It is my responsibility under the mandate provided to me by the Human Rights Council, to seek to clarify all cases brought to my attention. Since I am expected to report on these cases to the Human Rights Council, I would be grateful for your cooperation and your observations on the following matters:

1. Please provide any additional information and any comment you may have on the above-mentioned allegations.
2. Please provide information on the status and outcome of any investigation into the killings of the twenty-five persons identified in this letter as well as of any other similar killings, including those identified in my previous communications (PHL 2/2016; PHL 1/2017; PHL 3/2017; PHL 6/2017; PHL 7/2017). If investigations have not been initiated, please explain the reasons why, and how this is consistent with the Philippines' international human rights obligations.
3. Please provide information on the Philippines Government's policy, legal framework and procedures with regard to efforts aimed at preventing and curbing the problem of drug consumption and trafficking in the country. What safeguards are in place to ensure that criminal activities related to drug trafficking are addressed while individuals' rights to life, personal security, integrity and other human rights, including the right to due process and fair trial, are respected? To what extent are these safeguards effectively implemented?
4. Please provide information about the number and outcome of criminal prosecutions undertaken against law enforcement personnel found responsible for violations of the right to life in the context of anti-drug operations.

I would appreciate a response within 60 days.

While awaiting a reply, I respectfully urge that all necessary interim measures be taken to prevent the loss of life as a result of your Excellency Government's anti-drug operations and in the event that investigations support or suggest the allegations to be correct, to ensure the accountability of any person responsible of any alleged violation.

I am considering to publicly express my concerns in the near future as, in my view, the information available to me is sufficiently reliable to indicate a matter warranting serious attention. I also believe that the wider public should be alerted about the human rights implications of the above-mentioned allegations. Any public statement

on my part will indicate that we have been in contact with your Excellency's Government's to clarify the issues in question.

Your Excellency's Government response will be made available in a report to be presented to the Human Rights Council for its consideration.

Please accept, Excellency, the assurances of my highest consideration

Agnes Callamard  
Special Rapporteur on extrajudicial, summary or arbitrary executions

## **Annex**

### **Reference to international human rights law**

In connection with the above-alleged facts, I would like to refer your Government to Article 3 of the Universal Declaration of Human Rights (UDHR) and Article 6 (1) of the International Covenant on Civil and Political Rights (ICCPR), ratified by the Philippines on 23 October 1986, which guarantee the right of every individual to life and security and provide that these rights shall be protected by law and that no one shall be arbitrarily deprived of his or her life. Furthermore, according to Article 2 (3) of the ICCPR any person whose rights or freedoms recognized in the Covenant are violated shall have an effective remedy.

I also wish to draw your Excellency's Government's attention to relevant international principles and norms governing the use of force by law enforcement authorities. Under international law, any loss of life that results from the excessive use of force without strict compliance with the principles of necessity and proportionality constitute an arbitrary deprivation of life and it is therefore illegal.

The Code of Conduct for Law Enforcement Officials, General Assembly resolution 34/169 of 17 December 1979 and the Basic Principles on the Use of Force and Firearms by Law Enforcement Officials (adopted by the Eighth United Nations Congress on the Prevention of Crime and the Treatment of Offenders, Havana, 27 August to 7 September 1990), provide an authoritative interpretation of the limits on the conduct of law enforcement forces. According to these instruments, intentional lethal use of firearms may be permitted strictly when it is unavoidable to protect life and necessary to carry out law enforcement duties. Should lethal force be used, restraint must be exercised at all times and damage and/or injury mitigated. Medical assistance should be provided as soon as possible when necessary.

According to international human rights law, the Government is under an obligation to protect individuals' right to life not only from acts committed by State actors, but also from those committed by non-State actors, such as vigilante groups, death squads or criminal gangs. States are required to act with due diligence to prevent arbitrary deprivation of life. The standard of due diligence, as applied to the responsibility of preventing arbitrary killing by non-State actors, relies on an assessment of how much the State knew, the risks or likelihood of harms, and the seriousness of harm. Data from the Philippine Drug Enforcement Agency show that as of March 2018, over 4,000 drug-linked individuals have been killed. According to the Philippines' Commission on Human Rights, over 16,000 cases, which may or may not be drug-related, should be under investigation. Thus, the official death count may be significantly higher. Such large number of recorded deaths, as well as the similarities in the modus operandi of perpetrators, reflect significant information already available to your Excellency's Government in connection with the lethal violence occurred within the context of anti-drug operations.

With regard to the one case of alleged death in custody, I wish to remind your Excellency's Government that, death in any type of custody should be regarded as a prima facie summary or arbitrary execution. Such cases should be thoroughly, promptly and impartially investigated especially in circumstances suggesting unnatural death (see, *Eshonov v. Uzbekistan*, CCPR/C/99/D/1225/2003). In this respect, I wish to recall that the obligation of States to carry out thorough, prompt and impartial investigation of all suspected cases of extra-legal, arbitrary and summary executions, is set forth in the Minnesota Protocol on the Investigation of Potentially Unlawful Death (2016) and the Principles on Effective Prevention and Investigation of Extra-Legal, Arbitrary and Summary Executions (1989). The Human Rights Council reiterated this obligation in its Resolution 26/12 on the "Mandate of the Special Rapporteur on extrajudicial, summary or arbitrary executions" specifying that it includes identifying those responsible and bringing them to justice; granting adequate compensation to victims or their families; and taking steps to end impunity and the recurrence of such executions. (See A/HRC/26/12, Op. 4).