

**Mandates of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression; the Special Rapporteur on the situation of human rights defenders; 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**

Ref.: AL PHL 7/2025  
(Please use this reference in your reply)

4 December 2025

Excellency,

We have the honour to address you in our capacities as Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression; Special Rapporteur on the situation of human rights defenders; Special Rapporteur on the independence of judges and lawyers and Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism, pursuant to Human Rights Council resolutions 52/9, 52/4, 53/12 and 58/14.

In this connection, we would like to bring to the attention of your Excellency's Government information we have received concerning the **ongoing pretrial detention and prolonged delays in the trials against journalist Frenchie Mae Cumpio and human rights advocates Marielle Domequil and Alexander Abinguna, and the new criminal charges brought against Ms. Cumpio and Mr. Abinguna.**

We wish to recall previous communications [AL PHL 5/2024](#), where the Special Rapporteur on freedom of expression detailed the background of this case, including their detention, initial charges and additional charges brought later against Ms. Cumpio and Ms. Domequil, as well as [AL PHL 4/2023](#), which also addressed these same cases. We thank your Excellency's Government for the replies provided on [11 April 2025](#) and [29 December 2023](#) respectively.

Frenchie Mae Cumpio is a journalist and community radio broadcaster at Eastern Vista and Aksyon Radyo Tacloban, known for her coverage of alleged abuses and human rights violations by State security forces.

Marielle Domequil is a human rights defender and a member of the Rural Missionaries of the Philippines.

Alexander Philip Abinguna is a human rights defender and a member of the NGO Karapatan's National Council for Eastern Visayas.

According to the information received:

*Prolonged delays in the judicial proceedings for the criminal charges initially brought against them*

Frenchie Mae Cumpio, Marielle Domequil and Alexander Abinguna were arrested in the early morning of 7 February 2020 in simultaneous raids in Tacloban City, Leyte province, and were initially charged with **illegal possession of firearms and explosives**, an unbailable offence. Reports suggest

that these accusations are baseless and presumptively filed in retaliation for their work as human rights advocates, after months of ‘red-tagging’, surveillance, intimidation and harassment attributed to State forces. In July 2021, an additional charge of **financing terrorism** was filed against Ms. Cumpio and Ms. Domequil, claiming the discovery of funds at the staff house during the search carried out the night of their arrest allegedly intended to fund terrorist activities.

The judicial proceedings against Ms. Cumpio and Ms. Domequil only started on 11 November 2024, almost five years after their arrest. On that date, the trial on the illegal possession of firearms and explosives case began at the Regional Trial Court, Branch 45, of Tacloban City. Ms. Cumpio and Ms. Domequil took the stand to provide their testimony in March 2025. The last hearing of their trial took place on 29 September 2025. The hearing for the verdict has been set for 22 January 2026, potentially extending Ms. Cumpio and Ms. Domequil’s detention to almost six years without conviction.

Mr. Abinguna was only arraigned in April 2021, one year after his arrest, and his pre-trial conference for this first case took place in July 2021 at the Regional Trial Court, Branch 46, of Tacloban City. Since then, only 3 out of the 21 witnesses that the prosecution announced have been presented by the prosecution. The repeated delays resulting from the prosecution’s failure to present witnesses on time have been allowed by the judge, who has granted several postponements. Almost 6 years after his arrest, Mr. Abinguna has not yet been called to testify; nor has he been able to present his defence.

*New charges recently brought against Frenchie Cumpio and Alexander Abinguna*

On 4 August 2025, it became known to the public that the prosecution had filed additional criminal charges of **double murder and multiple attempted murders** against Ms. Cumpio and Mr. Abinguna, in connection with an ambush of State security forces that took place on 18 October 2019 near Sumoroy, in Northern Samar province. The incident reportedly resulted in the deaths of two soldiers and injuries to others.

These charges were reportedly initially filed in early 2020, prior to Ms. Cumpio and Mr. Abinguna’s arrest, and arrest warrants were issued on 7 September 2020 and again on 6 August 2021. The case remained dormant for several years, and, despite already being in pretrial detention since early 2020, Ms. Cumpio and Mr. Abinguna were not made aware of the charges until February 2025, when the Commission on Human Rights (Region 8) sent them a subpoena instructing them to submit their counter-affidavits and other pertinent documents, as they were investigating the case. The charges against them were only made public in August 2025. Authorities have claimed that the arrest warrants were not executed at the time of the filing of the case due to procedural errors, including a misspelling of Ms. Cumpio’s name.

The allegations of double murder and multiple attempted murders are reportedly based on the testimony of a former rebel turned army auxiliary, who claims to

have survived the ambush and identified Ms. Cumpio among the attackers, citing personal knowledge of her alleged role in recruiting members for the New People's Army. Another purported survivor of the attack, a paramilitary soldier, did not mention Ms. Cumpio in his sworn statement. No material evidence has reportedly been submitted to the court to support the allegations about Ms. Cumpio or Mr. Abinguna's presence on the scene.

At the time when the ambush took place, in October 2019, Ms. Cumpio was residing in Tacloban City, more than seven hours by road from the site of the ambush and was already under surveillance by military authorities in connection with a separate investigation that later led to her arrest on 7 February 2020. According to reports, neither Ms. Cumpio nor Mr. Abinguna were questioned or investigated in relation to the October 2019 incident before or after their arrest in 2020.

An investigation into the killings opened by the Commission on Human Rights of the Philippines, following a request by the families of the deceased soldiers, was eventually closed "for lack of sufficient evidence" regarding Ms. Cumpio and Mr. Abinguna's alleged involvement.

On 6 November 2025, the Lao-ang Northern Samar Regional Trial Court, Branch 21, in charge of reviewing these new charges, granted Ms. Cumpio's Motion to Quash the charges of double murder and attempted multiple murder on grounds of "lack of jurisdiction" over Ms. Cumpio due to the misspelling of the name in the charge sheet, that that made her arrest "invalid".

In contrast, Mr. Abinguna's Motion to Quash the charges was rejected by the court on the same date.

These additional charges have been widely criticized by human rights and media freedom groups as an attempt to ensure their continued detention, including in a context where other human rights defenders and activists have recently been released after the court quashed unfounded charges of possession of illegal weapons that they were facing.

#### *Court of Appeals' ruling on the forfeiture of allegedly discovered money*

In a separate judicial proceeding regarding the forfeiture of the money allegedly found at Ms. Cumpio and Ms. Domequil's room during their arrest ordered by the Anti-Money Laundering Council, on 5 November 2025, the Court of Appeals Third Division ruled to reverse the Manila Regional Trial Court's ruling of December 2022 and to nullify the forfeiture of the money on the basis that the accusations against Ms. Cumpio and Ms. Domequil of being terrorists or members of the New People's Army were not substantiated.

The court found that the Anti-Money Laundering Council failed to establish that the seized funds were related to or intended to finance terrorism or prove any link between Ms. Cumpio and Ms. Domequil and the Communist Party of the Philippines-New People's Army (CPP-NPA). The decision reads: "The Court cannot countenance the hasty labelling of human rights advocates as terrorists

and the speedy confiscation of their funds and property in the name of national security. Measures to counter terrorism must not be done without due process, and at the expense of individuals, groups, and civil society organizations that are engaged in the promotion and defence of human rights.”

Without wishing to prejudge the accuracy of the above-mentioned allegations, we reiterate our great concern about the extremely prolonged pretrial detention of Ms. Frenchie Mae Cumpio, Ms. Marielle Domequil, and Mr. Alexander Abinguna and the extraordinary length of the criminal proceedings against them.

The recent introduction of new criminal charges against Ms. Cumpio and Mr. Abinguna, more than five years later after their detention, and apparently based on the account of a single witness that is currently part of the Armed Forces, seems to be part of a deliberate strategy to prolong their unfair detention and further intensifies concerns of legal harassment against them. This was the second time that additional charges have been unexpectedly filed against Ms. Cumpio, as in July 2021 the prosecution also decided to file an additional charge of financing terrorism against Ms. Cumpio and Ms. Domequil on top of their original charges. While we welcome the court resolution quashing the charges against Ms. Cumpio due to irregularities in the proceedings, we are concerned that Mr. Abinguna continues to face these charges in addition to the initial ones. The apparent lack of transparency, due process guarantees, and substantiated evidence in relation to the initial and new charges reinforces the perception that criminal proceedings are being misused as a tool of intimidation and silencing.

As we noted in our previous communication to the Government about these cases and the country visit report of the Special Rapporteur on freedom of opinion and expression ([AL PHL 5/2024](#); [A/HRC/59/50/Add.1](#)), there are reasonable grounds to consider that their detention and prosecution may be taking place in retribution for their engagement in journalistic or human rights defense work and advocacy, at times critical of the authorities. There are similarly reasonable grounds to assert that the conducts described above are not individual and isolated cases of breaches of human rights but, on the contrary, they exemplify concerning patterns about the red-tagging and legal harassment to which many journalists, activists and human rights defenders are subjected to in the Philippines, as well as the breaches of basic due process safeguards in the criminal proceedings against them.

We reiterate the concerns raised in [PHL 4/2023](#) regarding the charges of terrorism financing against Ms. Cumpio and Ms. Domequil and the misuse of counter-terrorism and counter-terrorism financing frameworks to unduly restrict legitimate activities. Noting the allegations of grave fair trial violations, we echo the Human Rights Committee’s call for your Excellency’s Government to “[e]nsure that individuals suspected of or charged with terrorist acts or related crimes are provided, in law and in practice, with all appropriate legal safeguards, in particular the right to be informed of the charges against them, to be brought promptly before a judge and to have access to legal counsel” (CCPR/C/PHL/CO/5, para. 14(b)). We have previously raised concern regarding the overbroad and vague definition of terrorism under the Anti-Terrorism Act of 2020 and its incompatibility with your Excellency’s Government’s international human rights law obligations ([PHL 4/2020](#)). We once again underscore the complementary and mutually reinforcing relationship between compliance with

human rights treaties and standards and effective counter-terrorism measures, and stand ready to provide any technical assistance your Excellency's Government may request to ensure full compliance with international law.

We welcome the ruling of the Court of Appeals Third Division that reversed the Manila Regional Trial Court ruling of December 2022 and nullified the forfeiture of the money allegedly found at Ms. Cumpio and Ms. Domequil's room during their arrest on the basis that the accusations against them of being terrorists or members of the New People's Army have not been substantiated. In particular, we draw attention to the Court's concerns regarding the "hasty labelling of human rights advocates as terrorists" and echo its statement that "[m]easures to counter terrorism must not be done without due process, and at the expense of individuals, groups, and civil society organizations that are engaged in the promotion and defence of human rights". We call on the tribunals currently considering the charges against Ms. Cumpio, Ms. Domequil and Mr. Abinguna to give due consideration to this ruling.

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.

As it is our responsibility, under the mandates provided to us by the Human Rights Council, to seek to clarify all cases brought to our attention, we would be grateful for your observations on the following matters:

1. Please provide any additional information and/or comment(s) you may have on the above-mentioned allegations. Please indicate if there is any other investigation open or under consideration against Ms. Cumpio, Ms. Domequil or Mr. Abinguna in addition to the ones mentioned in this letter.
2. Please indicate what measures the government is taking or intends to take to avoid undue prolongation of hearings and to promptly ensure a fair and impartial conclusion of the trials against Ms. Cumpio, Ms. Domequil and Mr. Abinguna.
3. Please explain how the length of five years of pretrial detention would not constitute 'unreasonable delay' under the provisions of article 14(3)(c) of the ICCPR, and justify the length of the proceedings, especially given that the defendants remained in detention.
4. Please indicate whether the definition of terrorism and terrorist financing offences and applicable procedures will be reviewed and reformed in order to comply with international human rights law.

This communication and any response received from your Excellency's Government will be made public via the communications reporting [website](#) within 60 days. They will also subsequently be made available in the usual report to be presented to the Human Rights Council.

While awaiting a reply, we urge your Excellency's Government, and in particular the Department of Justice, the Attorney General's Office and the relevant judicial authorities to **bring a prompt, fair and impartial conclusion to the trials** of Frenchie Mae Cumpio, Marielle Domequil, and Alexander Abinguna, respecting the independence of the judiciary and in line with the human rights obligations of the Philippines.

Please accept, Excellency, the assurances of our highest consideration.

Irene Khan

Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression

Mary Lawlor

Special Rapporteur on the situation of human rights defenders

Margaret Satterthwaite

Special Rapporteur on the independence of judges and lawyers

Ben Saul

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## **Annex**

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

In connection with the above alleged facts and concerns, we would like to draw the attention of your Excellency's Government to the right to freedom of opinion and expression as set forth in article 19 of the Universal Declaration of Human Rights (UDHR) and article 19 of the International Covenant on Civil and Political Rights (ICCPR), ratified by the Philippines on 23 October 1986. Additionally, we would like to refer your Excellency's Government to articles 9, 17, 14 and 22 of the ICCPR, which provide for the rights to liberty and security of the person, not to be subjected to arbitrary arrest or detention, to be promptly informed of the reasons for the arrest and of any charges against the person, to be brought promptly before a judge, to a fair trial within a reasonable time, to privacy and to freedom of association. These articles shall be read individually and together with article 2(3) of the ICCPR, which provides for the right to an effective remedy for every person whose rights contained in the Covenant have been violated.

Article 14 of the ICCPR establishes the right to fair proceedings before a competent, independent and impartial tribunal established by law. In this regard, general comment No. 32 (2007) of the United Nations Human Rights Committee notes that the element of independence requires the judiciary to be free from political interference by the executive branch, as well as the legislature. The Committee notes in particular that a situation where the executive is able to control or direct the judiciary is incompatible with the notion of an independent tribunal (para. 19). Article 14 provides a set of procedural guarantees that must be made available to all persons, including the right of accused persons to have access to, and communicate with, a counsel of their own choosing.

Article 14(3)(c) of the ICCPR provides that anyone charged with a criminal offence is entitled to be tried without undue delay. The Human Rights Committee has found that even custodial delays of less than two years may be incompatible with the right to a fair trial when the authorities have not acted with sufficient care and expedition (Human Rights Committee, *Sextus v. Trinidad and Tobago*, U.N. Doc. CCPR/C/72/D/818/1998, para. 7.2.). Article 14(3)(a) provides for the right to be informed promptly and in detail in a language which the person understands of the nature and cause of the charge against him or her.

We would like to draw attention to the Basic Principles on the Independence of the Judiciary, adopted by the Seventh United Nations Congress on the Prevention of Crime and the Treatment of Offenders (Milan, Italy), 26 August-6 September 1985). These principles provide that it is the duty of all governmental and other institutions to respect and observe the independence of the judiciary (principle 1); that the judiciary shall decide matters before them impartially, on the basis of facts and in accordance with the law, without any restrictions, improper influences, inducements, pressures, threats or interferences, direct or indirect, from any quarter or for any reason (principle 2); that there shall not be any inappropriate or unwarranted interference with the judicial process (principle 4); and requires the judiciary to ensure that judicial proceedings are conducted fairly and that the rights of the parties are respected (principle 6).

Article 19 of the ICCPR guarantees the right to freedom of opinion and the right to freedom of expression, which includes the right “to seek, receive and impart information and ideas of all kinds, either orally, in writing or in print, in the form of art, or through any other media”. This right applies online as well as offline, protects the freedom of the press as one of its core elements and includes not only the exchange of information that is favourable, but also that which may criticize, shock, or offend.

In its [general comment No. 34](#), the Human Rights Committee stated that States parties to the ICCPR are required to guarantee the right to freedom of expression, including “political discourse, commentary on one's own and on public affairs, canvassing, discussion of human rights, journalism, cultural and artistic expression, teaching, and religious discourse” (CCPR/C/GC/34, para. 11). The Committee states that article 19 also covers the right of a free press and other media able to comment on public issues without censorship or restraint and to inform public opinion and a corresponding right of the public to receive media output.

The Committee further asserts that there is a duty of States to put in place effective measures to protect against attacks aimed at silencing those exercising their right to freedom of expression (para. 23). Recognizing how journalists and persons who engage in the gathering and analysis of information on the human rights situation and who publish human rights-related reports, including judges and lawyers, are frequently subjected to threats, intimidation and attacks because of their activities, the Committee stresses that “all such attacks should be vigorously investigated in a timely fashion, and the perpetrators prosecuted, and the victims, or, in the case of killings, their representatives, be in receipt of appropriate forms of redress” (para. 23).

Additionally, according to the Committee “the penalization of a media outlet, publishers or journalist solely for being critical of the government or the political social system espoused by the government can never be considered to be a necessary restriction of freedom of expression” (para. 43).

Any restriction on the right to freedom of expression must be compatible with the requirements set out in article 19(3) ICCPR. Under these requirements, restrictions must (i) be provided by law; (ii) pursue one of the legitimate aims for restriction, which are the respect of the rights or reputations of others and the protection of national security or of public order (*ordre public*), or of public health or morals; and (iii) be necessary and proportionate for those objectives. The State has the burden of proof to demonstrate that any such restrictions are compatible with the Covenant, proving “in specific and individualized fashion the precise nature of the threat, and the necessity and proportionality of the specific action taken, in particular by establishing a direct and immediate connection between the expression and the threat” (CCPR/C/GC/34, para. 35). The Human Rights Committee recalled that the relation between right and restriction and between norm and exception must not be reversed.

Article 20(2) ICCPR prescribes that any advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence shall be prohibited by law. Yet, this prohibition, that may entail restrictions of free expression, has a high threshold as it requires the fulfilment of three components: a) advocacy of hatred; b) advocacy which constitutes incitement; and c) incitement likely to result in

discrimination, hostility or violence (A/67/357, para. 43).

In its resolution 12/16, the Human Rights Council called on States to refrain from imposing restrictions that are not consistent with article 19(3), including: discussion of government policies and political debate; reporting on human rights; engaging in peaceful demonstrations or political activities, including for peace or democracy; and expression of opinion and dissent, religion or belief, including by persons belonging to minorities or vulnerable groups ([A/HRC/RES/12/26](#)).

We also wish to call your Excellency's Government's attention to Human Rights Council resolution 13/13, which urges States to put an end to and take concrete steps to prevent threats, harassment, violence and attacks by States and non-State actors against all those engaged in the promotion and protection of human rights and fundamental freedoms ([A/HRC/RES/13/13](#)).

Article 22 of the ICCPR protects the right to freedom of association, including civil society associations and political parties. These rights are essential components of democracy since they empower women, men and youth to “express their political opinions, engage in literary and artistic pursuits and other cultural, economic and social activities, engage in religious observances or other beliefs, form and join trade unions and cooperatives, and elect leaders to represent their interests and hold them accountable” (Council resolution 15/21, preamble)” (A/68/299, para. 5).

The international law on deprivation of liberty prohibits States from detaining any individual without a valid order to that effect. Article 9 of the ICCPR prohibits the detention of individuals without a legal basis. Similarly, rule 7 of the [United Nations Standard Minimum Rules for the Treatment of Prisoners](#) (the “Nelson Mandela Rules”) establishes that no individual should be detained in a prison without a valid commitment order. Principle 4 of the Body of Principles for the Protection of All Persons under Any Form of Detention or Imprisonment (the “Body of Principles”) echoes this prohibition by requiring that any form of detention be ordered by or subject to the control of a judicial or other authority. In addition, the Human Rights Committee has noted that any detention due to the peaceful exercise of rights is arbitrary (general comment No. 35, para 17).

Furthermore, we would like to stress that the law on detention varies according to the type of detention. Rules 11 and 112 of the Mandela Rules further provide that untried individuals shall be kept separate from tried individuals, and shall sleep singly in separate rooms. Rule 113 of the Nelson Mandela Rules further provide that untried individuals shall be kept separate from tried individuals, and shall sleep singly in separate rooms. Rule 113 of the Nelson Mandela Rules requires that untried prisoners sleep alone in separate rooms. Principle 8 of the Body of Principles also stresses the need for individuals not yet convicted to be kept separate from those convicted. Rule 56 of the United Nations Rules for the Treatment of Women Prisoners and Non-custodial Measures for Women Offenders (the “Bangkok Rules”) emphasizes the particular risk of abuse that women face in pretrial detention and provides that the authorities shall adopt appropriate measures to guarantee women's safety.

Regarding detainees' medical health, rule 24 of the Mandela Rules safeguards detainees' right to access necessary health-care services, without charge, and rule

25 specifically provides that a detainee may request a second medical examination or opinion, subject only to reasonable conditions related to security and good order. Rule 118 further makes clear that untried detainees must be allowed to be visited and treated by their own doctor if there are reasonable grounds for such request and if they are able to pay the expenses incurred. Similar guarantees are established by the Bangkok rules.

Furthermore, we would like to refer your Excellency's Government to the fundamental principles set forth in the Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms, adopted on 9 December 1998 (also known as the UN Declaration on Human Rights Defenders). Articles 1 and 2 of the Declaration state that everyone has the right to promote and to strive for the protection and realization of human rights and fundamental freedoms at the national and international levels and that each State has a prime responsibility and duty to protect, promote, and implement all human rights and fundamental freedoms.

We further recall that article 17(1) of the ICCPR prohibits arbitrary or unlawful interferences with a person's privacy, family, home or correspondence, and unlawful attacks on a person's honour and reputation. Article 17(2) provides that "[e]veryone has the right to the protection of the law against such interference or attacks." Any interference with the right protected under article 17 must be strictly necessary and proportionate in pursuit of a legitimate aim. The Human Rights Committee has emphasized the duty of States "not to engage in interferences inconsistent with article 17 of the Covenant and to provide the legislative framework prohibiting such acts by natural or legal persons" (general comment No. 16, para. 9). It noted that ordinarily, "[s]urveillance, whether electronic or otherwise, interceptions of telephonic, telegraphic and other forms of communication, wire-tapping and recording of conversations should be prohibited" (para. 8).

Finally, we emphasize the many resolutions of the United Nations General Assembly, Security Council and Human Rights Council that reaffirm that any measures taken to combat terrorism and violent extremism must comply with the obligations of States under international law, in particular international human rights law, refugee law and international humanitarian law.<sup>1</sup> Counter-terrorism measures must conform to fundamental requirements of legality, proportionality, necessity and non-discrimination. Disregard for these principles can have exceptionally harmful effects on the protection of fundamental rights, particularly for minorities, historically marginalized communities, and civil society. States must ensure that measures to combat terrorism do not hinder the work and safety of individuals, groups and organs of society engaged in promoting and defending human rights, including when enacting measures to counter the financing of terrorism (A/HRC/RES/22/6, para. 10(a)).

Although no universal treaty generally defines "terrorism", States should ensure that counter-terrorism legislation is limited to criminalizing conduct which is properly and precisely defined on the basis of the international counter-terrorism instruments,<sup>2</sup>

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<sup>1</sup> Security Council resolutions 1373 (2001), 1456 (2003), 1566 (2004), 1624 (2005), 2178 (2014), 2242 (2015), 2341 (2017), 2354 (2017), 2368 (2017), 2370 (2017), 2395 (2017) and 2396 (2017); Human Rights Council resolution 35/34; and General Assembly resolutions 49/60, 51/210, 72/123 and 72/180, among others.

<sup>2</sup> See [https://treaties.un.org/Pages/DB.aspx?path=DB/studies/page2\\_en.xml](https://treaties.un.org/Pages/DB.aspx?path=DB/studies/page2_en.xml).

the General Assembly's Declaration on Measures to Eliminate International Terrorism (1994), and Security Council resolution 1566 (2004). Based on these authoritative sources, the model definition of terrorism advanced by the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism provides clear, "best practice" guidance, by identifying conduct that is genuinely terrorist in nature and precisely defining the elements (A/HRC/16/51, para. 28).

The principle of legality under article 15(1) of the ICCPR requires that criminal laws are sufficiently precise so that it is clear what types of behaviour and conduct constitute a criminal offence and what would be the legal consequences of committing such an offence. This principle recognizes and seeks to prevent ill-defined and/or overly broad laws which are open to arbitrary application and abuse, including to target civil society on political or other unjustified grounds (A/70/371, para. 46(b)) and suppress the exercise of fundamental rights and freedoms (A/HRC/40/52).

The financing of terrorism has long been a concern for States as evidenced by the negotiation and agreement on the 1999 International Convention for the Suppression of the Financing of Terrorism, which was designed to criminalize acts of financing terrorism, and which was ratified by Philippines on 7 January 2004. Since then, a number of Security Council resolutions have expressly called for the criminalization of terrorism financing, including the landmark Security Council Resolution 1373 and Security Council Resolution 2462, the first comprehensive resolution addressing the prevention and suppression of terrorism financing. The latter resolution "[d]emands that Member States ensure that all measures taken to counter terrorism, including measures taken to counter the financing of terrorism [. . .] comply with their obligations under international law, including international humanitarian law, international human rights law and international refugee law."