

When Cyber Libel Restrains Press Freedom: The Case of Maria Ressa

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The Asian Conference on Media, Communication & Film 2023
Official Conference Proceedings

Abstract

Local and international journalism organizations continuously call for the decriminalization of libel, monitor harassment and impunity toward media practitioners, and push for the free speech of media organizations and their journalists. In the Philippines, threats to journalism can hardly disappear when tyrants are elected into government: freedoms of expression and of the press are continuously challenged by defamation laws, bias allegations, and franchise issues. A widely known instance of press intimidation through cyber libel is the series of cases filed against Nobel laureate Maria Ressa. Libel has long been a criminal offense in the country, but it was only in 2012 that cyber libel was signed into law. Since the approval of the cyber libel law, a total of 3,809 cases have been handled by the National Prosecution Service. In order to restore press freedom in the country, a collective effort and understanding of the Philippine media landscape are needed. Using critical theory frameworks, along with four theories of the press, the paper analyzes the complexities and contradictions of marginalization and resistance in the Philippine journalism landscape, particularly surrounding the cyber libel case against Rappler founder Maria Ressa. The paper looks at journalists and the press as a marginalized group dominated by authoritarian governments and critiques the domination in structures that produce privilege for some and oppression for others.

Keywords: Maria Ressa, Cyber Libel, Rappler, Press Freedom, Online News

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Introduction

When a country suffers from the atrocities of a dictatorship, it becomes crucial for the citizens to remember why they should never experience it again. The suppression of democratic institutions and restriction of civil liberties lead to the abridgment of human rights which inevitably results in the many horrors of the dictatorship. With this, democracy has long been regarded as the type of government that highlights the “power of the people.” Democracy values the participation of the people and one way this manifests itself is through freedom of speech.

According to Nielsen et al. (2016), a well-functioning democracy needs free and diverse news media which can keep people informed, hold powerful actors to account, and enable public discussion of public affairs. When the Philippine government was reestablished after the Martial Law period, the 1987 Constitution allowed the protection of the right to free speech through Article III of the Bill of Rights Section 4, stating that, “no law shall be passed abridging the freedom of speech, of expression, or of the press, or the right of the people peaceably to assemble and petition the government for redress of grievances.” This is anchored on Article 19 of the United Nations’ Universal Declaration of Human Rights, which states, “Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.”

This has been a starting point in defending press freedom in the country. However, over the past decades, the Philippines is still reported by the Reporters Without Borders (RSF) as one of the world’s deadliest countries for journalists. According to their World Press Freedom Index in 2023, the Philippines ranked 132nd of 180 countries with a global score of 46.21. Since 1986, the Center for Media Freedom & Responsibility (CMFR) has recorded 234 Filipino journalists and/or media worker killings by 2018, with 156 killed in the line of duty.

Apart from intimidation and violence, journalists are also faced with threats of imprisonment and criminalization from criminal libel or defamation laws. These have long challenged journalists in their reportage, frightening them into self-censorship, as conviction is punishable by fines and imprisonment.

A well-known journalist who faced a libel issue is Maria Angelita Ressa, the co-founder and CEO of Rappler which is one of the country's leading digital media companies. In 2017, she faced a cyber libel complaint along with the story’s researcher-writer Reynaldo Santos Jr. The complaint was made by businessman Wilfredo Keng over a story published in May 2012 about his alleged links to then-Chief Justice Renato Corona. This has become controversial because the story was published four months before the Cybercrime Prevention Act of 2012 was enacted. This meant that the law was used to retroactively pose a liability to Ressa and the article. Since then, she has headlined numerous news articles in different media channels including Rappler and Inquirer.net. This issue later on led to the rise of calls for decriminalizing libel laws.

The threat to journalism in the Philippines rises and falls each year, but media censorship was most apparent in the 1970s during the Marcos regime. However, press issues in the recent years since Duterte’s presidency have become similar to how journalists were silenced under the Martial Law period. A prime example of this is the rise of cyber libel cases filed against prominent journalists such as Rappler’s CEO Maria Ressa. Therefore, this study is guided by

the question, “How is Maria Ressa’s cyber libel case reported in the online news of Rappler and Inquirer.net?” Specifically, this study aims to answer the following questions:

1. What are the themes in the coverage of Maria Ressa’s cyber libel case?
2. What press freedom issues recurred from the identified themes?
3. How are the themes relevant to the Filipino press?

To better understand the news articles published by Rappler and Inquirer.net, this study employed the use of a critical lens.

Critical Theory

McKinnon (2009) discussed that contemporary critical theory is not a unified theory. Instead, it is a loose set of theoretical frameworks that works together to critique domination and aim for social change.

Critical theory offers analytical frameworks that can examine the complexities and contradictions of marginalization and resistance in a society. It is crucial to highlight that critical theory is not a theory in and of itself but rather a collection of complimentary theoretical frameworks that look at social structures where domination exists, so one can create opportunities for the liberation of individuals, meanings, and values (McKinnon, 2009).

Journalists and the press will be studied as a marginalized group dominated by the government. One of the key terms discussed in critical theory is the critique of domination wherein structures are understood to produce privilege for some and oppression for others. Consequently, this concept will be used to identify shades of inequality and structures of domination in the online news articles.

Four Theories of the Press

The four theories of the press, as presented by Siebert et al. (1963), include the authoritarian theory, libertarian theory, social responsibility theory, and Soviet theory.

The authoritarian theory establishes superiority over the ruling government. Here, the press and other media respect authority, constantly being subservient to existing power, while taking note not to offend the dominant moral, political, and economic ideals. Journalists cannot exercise much freedom and independence because their reports have to be submitted for advance censorship.

Meanwhile, the libertarian or free press theory is a contrast to the authoritarian theory. This view presents that an individual should be allowed to publish whatever they deem worthy. Additionally, this allows and encourages criticism of government policies. In this theory, journalists have full autonomy within their media organization.

The social responsibility theory covers a free but responsible press. While journalists have the right to criticize the government, they still have certain basic responsibilities to keep society stable. This theory is an extension of the libertarian theory wherein the press understands that it has a responsibility to society in carrying out its essential functions.

Lastly, the Soviet or communist media theory describes a context where the press and the state come together as one. Their press is self-regulatory concerning their message content. With this, they ensure the success and continuance of the Soviet socialist system to further promote their objectives.

Media Sovereignty and Watchdog Theory of Journalism

Theories of media sovereignty tackle the degree of autonomy and independence of the media, considering the possible obstacles to a free press such as “government interference, commercial requirements, antiterrorism legislation, and the demands of foreign policy” (Thomas, 2009, p. 643).

Meanwhile, one of the roles of the press is to serve as a watchdog of the government. According to McQuail (1994, as cited in Franklin, et. al, 2005), this theory extends rights to freedom of expression, religion, and assembly. The press also embodies the traditional idea of a Fourth Estate which has the role of investigating wrongdoings and defending truth and democracy.

These theories will help deepen the discussion on the roles of journalists, particularly Maria Ressa, and how Reynaldo Santos Jr.’s article published in 2012 led to their conviction of cyber libel in 2020.

Silencing and Muted Group Theory

According to Bruneau (2009), the concept of silencing is about the restriction of speech and expression restriction of ourselves and/or others. Similarly, the muted group theory encompasses this when dominant groups devalue, suppress, or mute the ideas and words of subordinate groups. Examples include the silencing of minority groups such as women, but this occurs in all sociocultural groups.

Since these theories are relevant to free speech, this study will relate issues of press freedom through these concepts. This may also open discussions on the ramifications of cyber libel and other forms of attacks on journalists.

The theories discussed in this section focus on the state and roles of journalists and the press which can allow the emergence of more prominent themes during data analysis. The Four Theories of the Press establishes a foundation on how media companies operate, considering the level of involvement of the government. Media Sovereignty and the Watchdog Theory of Journalism are helpful in understanding the roles of the press which can build views regarding the cyber libel case. Finally, Silencing and Muted Group Theory can guide the understanding of the actors involved in the articles to be analyzed. By having these theoretical underpinnings, the study can strengthen its base and form cohesive and more accurate results.

Conclusion

Themes Surrounding Maria Ressa's Cyber Libel Case

Journalism as a Dangerous Profession

Maria Ressa's cyber libel case touched on several topics and one of those is the dangers of being a journalist in the Philippines. Reporters Without Borders reports the Philippines as one of the most dangerous countries for journalists, and this can be proven by the several accounts of harassed journalists in the country. Maria Ressa's cyber libel case is just one account, yet the analysis of this study still surfaced the forms of harassment that journalists in the Philippines experience.

Harassment and Violation of Rights

Harassment of journalists in the Philippines takes many forms but one of the most common manifestations of this is being arrested or jailed. Some of the online news portray that Ressa and Rappler are continuously being targeted by the government due to their critical reportage. This suggests that journalists who criticize the government are punished and that the Filipino press is not treated fairly.

In particular, this study depicts harassment and violation of rights with Ressa being arrested twice and having to post bail eight times (ABS-CBN News, 2019). According to a tweet made by Ressa in 2019, Rappler faced 11 legal cases and complaints filed by the DOJ in 14 months. More specifically, her arrest inside Rappler's headquarters can be compared with being disrespected in one's own home. Ressa also was reported to have had to stay the night at National Bureau of Investigation because the local court refused to process her bail (Buan, 2019).

In the news articles, there is an evident depiction of authorities vilifying the media which can be detrimental to the trustworthiness of the organization. Word choices in the articles also imply the possibility of a more dangerous and toxic environment where journalists are more vulnerable to attacks. The news articles also mentioned several times the "weaponization of the law" which may imply that a sort of manipulation is happening within the government to conspire against journalists. This is especially relevant in the use of the cybercrime law to pin down Ressa under a cyber libel complaint. Apart from Rappler, other alternative and critical news organizations have been targeted through a series of amplified cyberattacks. In essence, these descriptions do not just indicate the harassment of journalists, but also the attack on press freedom and the right to information and expression.

Silencing and Threatening Dissenters

This subtheme discusses another form of attack to press freedom wherein showing disagreement toward the government causes danger. The online news analyzed depicts the government and those in power as sensitive to critics. With this, they use their power to silence or "muzzle" journalists to prevent news that will damage their reputation.

One scenario described in Rappler's articles was a police officer who said "be silent or you're next" to Ressa's colleague. Another example of this is the media giant ABS-CBN shutdown under the former president Duterte's administration. Following this event which happened in

March 2020, arguments were raised that Ressa's arrest is part of the Duterte administration's broader campaign to harass and silence its critics, and on a greater scale, to obliterate democratic institutions such as a free press.

This is better visualized in a documentary about Ressa, *A Thousand Cuts*, wherein the audience follows how her life and freedom were put at risk by being an outspoken critic of former President Rodrigo Duterte's war on drugs. The PBS Frontline documentary, with runtime of one hour and 39 minutes, premiered on January 25, 2023 at the Sundance Film Festival and was made available on March 13, 2021 on YouTube. As of November 14, 2023, the documentary has 1,314,607 views on the video streaming site. The phrase “a thousand cuts” was used as a metaphor by one of Ressa’s celebrity supporters mentioning that her arrest meant that death happened. Ressa also described their cases as a cautionary tale to the Filipinos. “We are meant to make you afraid,” she said, which sends a message that there are powerful people who want to threaten the greater public. This, in turn, leaves a chilling effect on other journalists.

Roles of a Journalist

Critic of the Government

The watchdog theory of journalism suggests that one of the roles of the press is to serve as a watchdog of the government, specifically, to investigate the wrongdoings and flaws of the government. The online news analyzed in the study showed how Rappler depicted Ressa’s role of holding powerful people accountable and exposing corrupt practices in the government. As such, Rappler was tagged several times in the articles as a critical media organization.

Protector of Rights

The traditional idea of a Fourth Estate suggests that journalists are also defenders of democracy. Ressa as an independent Filipina journalist was depicted in one of the articles as someone who will never allow press freedom to be suppressed. If journalists perform their other roles well, it is highly likely that they will also be able to protect the citizens’ rights. Since press freedom was also mentioned in the articles as a prerogative to democracy, it is essential for journalists to first ensure that they are protecting other rights such as the freedom to express and the right to know.

Bringer of Truth

The last role identified in the analysis was the bringer of truth. During this time at the height of the spread of disinformation and misinformation, the public needs a reliable source of information. This role is fulfilled by journalists such as Ressa who is portrayed in the online news as a purveyor of truth or truth-teller. In one of Inquirer.net’s articles, Senator Francis Pangilinan described Maria Ressa as a “beacon of speaking truth to power.”

On the other hand, it is also the role of journalists to correct any form of error. While it makes more sense to correct substantial pieces of information such as context, it is also a journalistic practice to update articles if there are grammatical or typographical errors found after publication. In this study, Rappler’s typographical correction reflects their diligence in their

journalistic practices. However, this meant the republication of the article which Keng used as grounds for the validity of his cyber libel complaint.

Government Control

Selective Justice

Selective justice is a threat to the rule of law because it does not serve justice. Instead, it sponsors injustice and weakens the country's justice system (Shaheed, 2021). In turn, the public loses trust in the government because of the unfair treatment that they have shown toward its citizens. This is exhibited in the news articles when comparisons were made regarding the government's unfair treatment of its critics and politicians guilty of other crimes. This suggests that Ressa received unfair treatment, especially considering that the Duterte administration was averse to criticism.

In other articles, certain metaphors such as “fishing expedition,” and word choices such as “twisted” and “connive” were used, which depict the case as a politically motivated attack to pin down Rappler, especially with the media organization facing 11 other investigations and cases. An *Inquirer.net* article also mentioned a politician's description of Duterte's “penchant to selective justice” suggesting that an event like this has happened before. Meanwhile, Ressa's lawyer, Amal Clooney, called the cyber libel issue a government-backed case and called for “sanctions for governments violating the right to a free press.”

Unchecked Power of Bureaucracy

Bureaucracy is a system of government that has multi-leveled systems and processes which are meant to keep uniformity and better management. However, this also effectively makes the decision-making processes slow (Scot, 2022). On the other hand, there is the existence of bureaucracy with oppression. According to Bendix (1945, p. 195), it should not be taken lightly because “the extension of governmental functions has frequently curbed and sometimes obliterated the freedom of the individual.”

In Rappler's and *Inquirer's* articles, bureaucracy was depicted as the reason Ressa had to spend the night at the National Bureau of Investigation—the Pasay court judge refused to process Ressa's bail because the arrest was made after 5pm which is the end of office hours. However, the court could have processed the bail because according to Rappler, it had the authority to release Ressa. This depicts the court as an entity with power. Another depiction was the National Bureau of Investigation's power to restrict Rappler's journalist's live stream of Ressa's arrest at the media organization's headquarters. Meanwhile, other articles described the development of the case as “suspicious” and “coincidental.”

Corruption

According to Gonzales (2021), government corruption starts when elected officials are exposed to self-serving opportunities brought by their position's power. This is in contrast to their supposed role which is to cater to their constituents' needs. As a result, their incompetence breeds corruption.

Corruption in the articles was depicted as nepotism through Duterte's appointment of Keng's daughter into a government position, powerful people bending the law, and the government's

capability of illegal or immoral actions. Certain words were also used to describe the Philippine government, such as “flawed,” “unfair,” and “corrupt.” Some emotions attached to this include disgust, shame, and despair.

Wilfredo Keng’s illegal links are also discussed in this section due to his alleged involvement with ex-Chief Justice Renato Corona. Some of the online news depicted Keng as a controversial businessman who was the owner of a luxury car that Corona reportedly used during his court proceedings. He was also mentioned to be under surveillance by the government due to his alleged involvement in illegal/criminal operations such as human trafficking and drug smuggling.

Aversion to Criticism

Finally, the government’s incompetence is exhibited in its aversion to criticism. An Inquirer.net article described the government being led by a man proven averse to criticism and dissent and is willing to go to ridiculous lengths to forcibly silence critical media. This is supported by another Inquirer.net article which mentions that the government punitively punishes legitimate dissent.

Press Freedom Issues Discussed in the Online News

Libel as a Public Concern

Ressa’s conviction in June 2020 raised concerns about the major implications of cyber libel, describing a metaphor from the analysis which describes the cybercrime law as part of a “rising drumbeat of legal assaults against journalists.” However, Rappler’s case is not just a media concern, rather it is a public concern because of its threat to freedom of speech. The articles repeatedly described the dangers of the cybercrime law to internet users even if they are not journalists because everyone on the internet will be subjected to the law.

Press Issues During the Marcos and Duterte Administration

Maria Ressa’s conviction is similar to the events that happened during the Marcos regime. This is supported by a statement from the FOCAP where they mentioned the Filipinos’ independence since the “dark Martial Law days.” To contextualize, Martial Law was a time in history when the media experienced an intense attack on press freedom; journalists had been reported missing, and they were documented to have been either tortured or killed. De Jesus (2007) described this period as an institutionalization of Marcos’ control over the press. She narrated how leading journalists were picked up and detained and how the government controlled the press with the help of coercive force from the military. It was also this time when crony press and envelopmental journalism came to be, which both exhibited how journalism was controlled by the government, either through bribing with money or using close personal connections with those in power. De Jesus described the press in the country as a “mere mouthpiece for government officials.” Similarly, Ressa’s arrest mirrored the familiar style of Marcos’ dictatorship, where critics were silenced.

On the other hand, Duterte seemed to have been following Marcos’ steps with his drug war, as per depictions in the news articles: a dictator, oppressor, leader who abuses his power, a silencer of truth to avoid dissent, a misogynist, an authoritarian against a free press, a tyrant who has no accountability, and a destroyer of democracy.

It can also be noted that Duterte has threatened other media organizations in the past. An instance of this was in April 2017 when he threatened to block the renewal of ABS-CBN television's franchise once it expired in 2020. The threat was made following his accusation of estafa of the network for supposedly not providing him the airtime he had paid for during the 2016 election campaign period. This was followed by a statement from the National Union of Journalists of the Philippines (NUJP) that warned Duterte against his threat to personally block ABS-CBN's renewal. According to the statement, Duterte had criticized the media before, but it was the first time that he "openly threatened to shut down a media organization by using alleged offenses that have nothing to do with journalism." Consequently, NUJP concluded that these actions blatantly dangle the powers of the presidency and of the state, signaling Duterte's willingness to use his powers to stifle freedom of the press and of expression (Sabillo, 2017). The union also mentioned that Duterte was "clearly not joking," and soon after in May 2020, ABS-CBN was ordered to cease its operations by the National Telecommunications Commission under threat of prosecution (Martial Law Museum, 2020).

Fight for Media Rights

Another press freedom issue that surfaced from the online news is the fight for media rights classified into two categories: advocacy and activism.

Advocacy is speaking out against injustice while supporting social causes. In Rappler's and Inquirer.net's articles, advocacy for media rights is strengthened by the concept of press freedom as a pillar of democracy and human rights. Without a free press, the citizens cannot be aware of the current events. This makes them unable to participate in their communities as well-informed individuals, ultimately hindering a balanced democracy (Tsalamani, 2021). This scenario was described in a Rappler article using the word "crippled" suggesting that without democracy, there could be a threat to the citizens' rights and freedoms.

Apart from the abovementioned concepts, the articles also showed various forms of advocacy support given by different people. Several advocacy calls appeared in the articles such as "Defend Press Freedom" and Rappler's mantra "Hold the Line," along with some catch phrases such as "end harassment" and "repeal repressive law." Additionally, the explicit show of support through statements, posts, and tweets came from the Vice President of the Philippines, business groups, influential politicians and groups, human rights and youth groups, showbiz personalities, and even from common Filipino citizens.

Svirsky (2010) defined "activism" as a concept that stirs both thought and action, that when done successfully, the system is disrupted and pushed into a "far-from-equilibrium state," leading to a revolutionary passage. Activism is one of the triggers of evolution and re-creation within the system. This is exhibited in the online news articles in certain word choices such as "continuing the fight" and "speak out" which both refer to the fight for freedom of speech which is suppressed in Ressa's cyber libel case. These examples show what must be done to disrupt the system and create change. Two Rappler articles also highlighted the role of the youth in defending human rights, producing a visual imagery of youth groups holding protests, and a scenario of uniting and calling out the authorities. This is also supported by idioms such as "make their voices be heard" and "stand one's ground."

Other articles that depict activism for media rights include urging people to show dissent towards those in power and encouraging Filipinos to join the call for media rights because those who hold power can greatly influence the decision on Maria Ressa's case.

Relevance to the Filipino Press

The results of this study may be relevant and beneficial to the journalistic community in understanding how media organizations report about a renowned journalist, Maria Ressa, and her cyber libel case. This also opens the opportunity to identify press freedom issues that appear in online news articles.

Moreover, calls for decriminalization of defamation laws have been pushed for in the fight to attain press freedom. Even before cyber libel became a crime under the Cybercrime Prevention Act of 2012, journalists and media advocacy groups such as the CMFR and the NUJP have called for the decriminalization of libel for decades, wherein they have asked Congress to amend the provisions on libel of the 82-year-old Revised Penal Code. In 2023, defamation is still a crime, and media advocacy groups still heed the same calls. In December 2022, Senator Risa Hontiveros filed a bill that seeks to decriminalize libel which came after the cyber libel conviction of Baguio City journalist and Rappler contributor Frank Cimat (Bolledo, 2022). In relation to this, this study may also open discussions and future studies on the opportunity for other changes in policies that may address problems related to cyber libel.

On the other hand, the research study may also contribute to the discipline and practice of Development Communication as it highlights the importance of Sustainable Development Goals (SDG) in advocating for and attaining development in marginalized sectors. SDG 16: Peace, Justice, and Strong Institutions may guide the study in promoting and enforcing non-discriminatory laws for journalists for sustainable development.

Lastly, this study can be a guiding tool for future researchers interested in knowing the themes surrounding the news reports about Maria Ressa's cyber libel case, as well as other libel and cyber libel cases in general.

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