



HUMAN
RIGHTS
WATCH

“We’ll All Be Arrested Soon”

Abusive Prosecutions under Vietnam’s “Infringing on State Interests” Law



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State Interests” Law**

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Summary

“Tat ca chung ta deu bi theo doi

Tat ca chung ta sap bi bat roi”

(We’re all being watched

We’ll all be arrested soon)

— Hoang Nhuan Cam, Vietnamese poet (1952-2021)

The authorities in the Socialist Republic of Vietnam have long used vaguely worded and loosely interpreted provisions in the Vietnamese penal code and other laws to prosecute and imprison peaceful political and religious activists, land rights campaigners, and whistle blowers, and to crush all forms of dissent. These provisions—embedded in particular in the penal code’s article 331—criminalize acts deemed to “infringe upon the interests of the state,” an offense punishable by up to seven years in prison. Vietnamese authorities frequently use article 331 to prevent any public criticism of even low-level officials or protests.

Between 2018 and February 2025, Vietnamese courts had convicted and sentenced at least 124 people to harsh prison terms under article 331. This is a significant increase over the previous six-year period (2011-2017), when only 28 people were reportedly convicted and sentenced to prison for violating article 331’s predecessor, article 258.

In the past, people who were convicted under this law were often bloggers or human rights activists — those the government sought to silence but who were not considered as threats to the Communist Party of Vietnam’s monopoly on power. They were convicted of crimes considered less serious than crimes against national security. But as the examples in this report show, the authorities have enlarged the scope and application of article 331 so that it reaches further into society, beyond human rights and democracy dissidents (most of whom are now in prison) to all those who voice any grievance with state or local Communist Party and government officials. As a result, people with no appreciable public profile as activists face arrest and severe prison sentences even for criticizing low-level officials.

Recent cases of people sentenced under article 331 for “infringing upon state interests” include:

- **Tran Dinh Trien**, a prominent lawyer and a senior Communist Party member, who publicly raised serious concerns about the then chief justice of the Supreme People's Court on social media. In January 2025, a Hanoi court sentenced him to three years in prison.
- **Hoang Van Luan**, a petitioner who joined other land rights activists to demand adequate compensation for land that the local government confiscated for a development project. He used social media to post video clips of their trips to government offices to file complaints. In March 2024, a court in Ha Tinh province sentenced him to two years and six months in prison.
- **Danh Minh Quang**, an ethnic Khmer driver who complained on social media about discrimination against his family and advocated for recognition of Indigenous people. In February 2024, a court in Soc Trang province sentenced him to three years and six months in prison.
- **Nay Y Blang**, an ethnic Ede activist who participated in religious groups not having government approval, advocated for religious freedom. He met foreign diplomats to discuss the lack of religious freedom in Vietnam. In January 2024, a court in Phu Yen province sentenced him to four years and six months in prison.
- **Dao Ba Cuong**, who staged a protest inside his house after his son died in police custody in October 2022, which a family member livestreamed on social media. He wore funeral clothes, carried a portrait of his son and walked the streets to raise awareness about his son's death. In December 2023, a court in Phu Yen province sentenced him to two years in prison.
- **Vu Thi Kim Hoang**, a seamstress who allowed her partner, Nguyen Thai Hung, to live in her house and use her laptop, which Nguyen Thai Hung used to discuss political issues on social media. For hosting him, a Dong Nai court sentenced her to two years and six months in prison. In the same trial, Nguyen Thai Hung received a four-year prison sentence.
- **Le Chi Thanh**, a former police officer at Thu Duc prison in Binh Thuan province, who on social media had repeatedly accused his boss, a Communist Party official, of corruption. In June 2022, a court sentenced him to three years in prison.

For this report, Human Rights Watch examined dozens of Vietnamese court documents, media sources, including Vietnamese state-controlled and independent Vietnamese and foreign media, and hundreds of posts and videos on social media.

The Vietnamese authorities' increased use of article 331 is a little known facet of the government's expanding crackdown on ordinary people who are seeking to use social media and other peaceful means to publicly raise important social issues, including religious freedom, land rights, rights of Indigenous people, and government and Communist Party corruption.

The overbroad language of article 331 and its application to cases that pose no meaningful threat to "state interests" violate Vietnam's obligations under the International Covenant on Civil and Political Rights. These include respect for rights to freedom of expression, association, religion and peaceful assembly, and the rights to due process, including access to counsel, and a fair trial before a competent, independent and impartial court.

The Vietnamese government should immediately revoke article 331, release all those detained and imprisoned for exercising their basic human rights, institute fundamental reforms of the criminal justice system, and address the social and political problems underlying those who peacefully protest.

At a more fundamental level, Vietnam's heightened use of article 331 reflects the government's failure – despite its growing international profile with the G7 and the United Nations Human Rights Council – to address a myriad of social issues it faces in a manner consistent with human rights and good governance.

Recommendations

To the Government of Vietnam

- Repeal article 331 of the penal code.
- Release all persons who are detained or imprisoned for exercising their fundamental human rights to freedom of expression, association, religion and assembly, and adopt measures to end the arbitrary arrest and detention of peaceful protesters, activists, and critics of the government.
- Hold provincial and local officials accountable for human rights violations against people exercising their fundamental human rights in areas under their authority.
- Repeal or amend vaguely worded “national security” provisions and other provisions in the Vietnamese penal code that have been used to prosecute individuals for peaceful dissent, including: “sabotaging the unity policy” (article 116); and “making, storing, disseminating or propagandizing information, materials and products that aim to oppose the State of the Socialist Republic of Vietnam” (article 117).
- Amend the Criminal Procedure Code to ensure the due process rights of all criminal suspects, including prompt and unhindered access to legal counsel throughout the investigation period, which exposes defendants to an increased risk of torture and ill-treatment and undermines the principles of fair trial and due process of law. Lawyers should have sufficient access to the defendant in private to prepare a defense and full respect for lawyer-client confidentiality.
- Address in good faith the human rights issues that activists, bloggers, and others have raised publicly in social media and other forums, including religious freedoms, land rights, and rights of Indigenous peoples.
- Establish an independent and transparent mechanism for grievances against public officials, investigate all complaints submitted by citizens, and ensure no retaliation against whistleblowers.

To the European Union, United States, Japan, Australia, and other concerned governments

- Publicly and privately press Vietnam to immediately release all activists detained or imprisoned for peacefully expressing their opinions online, and to repeal article 331 of the penal code.
- Consider targeted sanctions against Vietnamese officials and entities responsible for serious violations of human rights.
- Use the formal annual human rights dialogue and/or other opportunities to press the Vietnamese government for clear, concrete, and measurable benchmarks for progress on human rights issues.
- Consider responding to the government's crackdown on human rights activists and bloggers and other serious human rights issues by suspending trade privileges and imposing human rights benchmarks.

To Donor Agencies, the United Nations, World Bank, and Asian Development Bank

- Publicly and privately call on the Vietnamese government to end all arbitrary arrests and detention of peaceful protesters and critics.
- Publicly and privately call on the Vietnamese government to repeal article 331 of the penal code and release all those detained and imprisoned for the exercise of their fundamental rights.
- Scrutinize development aid projects to ensure that they do not undermine human rights including projects that entail land confiscation.

Background: Criminal Laws on “Infringing on State Interests”

Vietnam’s government severely restricts basic civil and political rights in violation of the International Covenant on Civil and Political Rights (ICCPR), which Vietnam ratified in 1982. These include the rights to freedom of expression, association, peaceful assembly, movement, and religion and belief. The government prohibits the formation of any organization that it deems threatening to its monopoly of power. Authorities block access to websites and require social media and telecommunications companies to remove content considered politically sensitive. Those who criticize the one-party state face police harassment, restricted movement, physical assault by state security agents, and arbitrary arrest, detention, and prosecution. Police detain political activists for months without access to legal counsel and subject them to abusive interrogations and, in some cases, torture.

The justice system in Vietnam is neither impartial nor fair. All judges are Communist Party members and must obey instructions from the party. In all politically sensitive cases, verdicts are determined before trials begin. In recent history, all defendants charged in politically sensitive cases have been found guilty.¹

It is not clear how verdicts are determined in politically sensitive cases. However, a recently unearthed archival document about the famous political case known as Nhan Van–Giai Pham Affair from 1960 revealed that the judge was acting under a direct order from the Communist Party.² “The court belongs to the system of the State’s dictatorial apparatus,” the government document stated. The court “serves a political need, so it must always obey the leadership of the Party.”³

Since that time, Vietnam has undergone numerous transformations, but the view that the justice system must serve a political need and obey orders from the Communist Party remains unchanged.

¹ Human Rights Watch, Submission to the Universal Periodic Review of Vietnam, October 3, 2023, <https://www.hrw.org/news/2023/10/03/submission-universal-periodic-review-vietnam>.

² “A document about the trial of Nhan van – Giai pham (Mot tai lieu ve phien toa xu vu Nhan van – Giai pham),” Van Viet, October 22, 2020, <https://vanviet.info/tu-lieu/mot-ti-lieu-ve-phien-toa-xu-vu-nhn-van-giai-pham/> (accessed March 27, 2025).

³ Ibid.

Growing Criminalization of Political Dissent

Between 1985 and 2015, the Vietnamese government issued three penal codes (with multiple amendments in between). Each contained provisions for the criminal offense of “infringing on state interests” that became increasingly draconian with each new code.

The 1985 Penal Code

The first penal code of the Socialist Republic of Vietnam was issued in 1985 and was effective from 1986 to 2000. Its article 124 is similar to the provisions later found in article 331 of the current code. Article 124 provided for the punishment of those who “abuse” the rights to “democratic freedoms to infringe upon the interests of the State,” with up to one year in prison. Article 124 also aimed, at least in theory, to punish anyone who prevented citizens from exercising their basic civil and political rights. In 1995, the prominent dissident Hoang Minh Chinh was arrested and charged with article 124(2). He was convicted and sentenced to one year in prison.⁴

Article 124. The crime of violating the rights to assembly, association, and beliefs of citizens:

1. Anyone who carries out acts to prevent citizens to exercise the following rights to freedom would be punished with warning, non-custodial reform up to one year, or imprisonment from three months to one year:
 - a) The rights to freedom of assembly and association in accordance with the interests of the State and the people;
 - b) The rights to freedom of beliefs, to follow or not to follow any religions.
2. Anyone who abuses the above rights to freedoms and other democratic freedoms to infringe upon the interests of the State, social organizations or citizens will be subject to warning and non-custodial reform for up to one year, or be imprisoned from three months to one year.

The 1999 Penal Code

Vietnam issued a new penal code in 1999. Article 258, which replaced article 124, eliminated any potential responsibilities applicable to those “who carry out acts to prevent

⁴ Human Rights Watch news release, “Vietnam: Cultural Revolution-Style Attacks on Rights Activist,” December 7, 2005, <https://www.hrw.org/news/2005/12/07/vietnam-cultural-revolution-style-attacks-rights-activist>.

citizens to exercise” their basic rights. The punishment “for infringing on state interests” became much more severe, from a maximum one-year imprisonment to seven years.

Between 2000 and 2017, when the 1999 penal code was in effect, courts convicted and sentenced to prison at least 47 human rights activists and bloggers for violating article 258. Among them were prominent dissidents Nguyen Dan Que, Pham Que Duong, and Tran Khue, influential bloggers Nguyen Huu Vinh (known as Anh Ba Sam), Pham Viet Dao, and Truong Duy Nhat, independent journalist Truong Minh Duc, religious activist Nguyen Van Lia, and land rights activist Ho Thi Bich Khuong.

In July 2013, human rights bloggers in Vietnam issued their own statement, Statement 258, to urge the Vietnamese government to “consider the abrogation of Article 258 to demonstrate its commitment and contribution to promoting and protecting human rights.”⁵ Initially signed by 69 bloggers, Statement 258 was hand-delivered to foreign diplomats in Hanoi, representatives of the Office of the United Nations High Commissioner for Human Rights in Bangkok, and international nongovernmental organizations, including Human Rights Watch. As of 2025, seven of the initial signatories of Statement 258 were currently serving between 5 and 11 years in prison, including bloggers Pham Doan Trang, Nguyen Tuong Thuy, Nguyen Lan Thang, Bui Tuan Lam, Nguyen Chi Tuyen, Le Van Dung, and Truong Van Dung.⁶ At least 11 initial signatories were living abroad as political exiles. A few had been in and out of prison under political charges. Others were under intrusive police surveillance or have gone quiet out of fear of arrest.

Article 258. The crime of abusing the rights to democratic freedoms to infringe upon the interests of the State, the legitimate rights and interests of organizations, citizens.

1. Those who abuse the rights to freedom of speech, freedom of press, freedom of belief and religion, freedom of assembly, association, and other democratic freedoms to infringe upon the interests of the State, the legitimate rights and interests of organizations, citizens, shall be subject to warning, non-custodial reform for up to three years or a prison term of between six months and three years.

⁵ Statement 258, July 19, 2013, <http://tuyenbo258.blogspot.com/2013/07/statement-from-network-of-vietnamese.html> (accessed March 27, 2025).

⁶ Human Rights Watch’s Political Prisoner Profiles Page, <https://www.hrw.org/video-photos/interactive/2025/01/21/free-vietnams-political-prisoners>.

2. Those who commit the offense in serious circumstances shall be sentenced to between two and seven years of imprisonment.

The 2015 Penal Code

In 2015, Vietnam revised its penal code, making punishment even more severe for those whom the authorities deemed as threatening to the Communist Party's monopoly on power.⁷ The new code was passed by the National Assembly in November 2015, but did not go into effect immediately. Between 2015 and 2017, the authorities went through several revisions of a number of articles. When the 2015 penal code became effective in January 2018, the previous article 258 morphed into article 331. Although the content of article 331 is very similar to article 258, the slight changes exacerbated an already decimated human rights environment in Vietnam.

Article 331. The crime of abusing the rights to democratic freedoms to infringe upon the interests of the State, the legitimate rights and interests of organizations, individuals

1. Those who abuse the rights to freedom of speech, freedom of the press, freedom of belief and religion, freedom of assembly and association and other democratic freedoms to infringe upon the interests of the State, the legitimate rights and interests of organizations, and individuals, shall be subject to a warning, non-custodial reform for up the three years, or a prison term of between six months and three years.
2. Those whose offense has a negative impact on social security, order and safety, shall be sentenced to between two and seven years of imprisonment.

In article 258, the more serious punishment (two to seven years of imprisonment) was only applicable in "serious circumstances." But in article 331, a crime can be almost any activity that the authorities deem as having "a negative impact on social security, order and safety."

The first person known to be prosecuted under article 331 was citizen journalist Do Cong Duong. A land rights petitioner from Tu Son district, Bac Ninh province, Do Cong Duong used social media to voice his opinions about the injustice that his family and other

⁷ Human Rights Watch new release, "Vietnam's Proposed Revisions to National Security Laws," November 19, 2015, <https://www.hrw.org/news/2015/11/19/vietnams-proposed-revisions-national-security-laws>.

farmers suffered from their land being confiscated. He provided legal counsel to other land rights petitioners. On January 24, 2018, police arrested Do Cong Duong as he was attempting to film construction on a disputed land site. On September 17, 2018, a court in Bac Ninh province convicted and sentenced him to four years in prison for “disrupting public order” under article 318 of the new penal code. Less than a month later, on October 12, the same court convicted and sentenced him to five years in prison for “abusing the rights to democratic freedom to infringe upon the interests of the state” under article 331. An appeal court in January 2019 reduced the second sentence to four years, making his full prison term eight years. Do Cong Duong was unwell and died in prison in August 2022.

A Widening Pattern of Abuse

In broadening the use of article 331, the Vietnamese authorities have targeted people because of their involvement in a range of activities deemed critical of the state, including:

- Land rights petitioners who have protested against the confiscation of property;
- Local activists who have protested against economic projects that affect the local environment and people's livelihoods;
- Complainants who have denounced local authorities' corruption or police abuse;
- Campaigners who have called for religious freedom or recognition of Indigenous rights; and
- Critics of other government policies or actions.

In most cases, the charges against those targeted included their use of social media to publicize their protests and criticism. Many of these are included in the annex to this report. In the following 10 emblematic case studies, the victims participated in activities like those listed above, to which the authorities responded by arresting and prosecuting them under article 331. All were convicted and most were punished with significant prison sentences.

Truong Huy San

Truong Huy San (born 1961), known as Huy Duc, is a prominent blogger and an environmental activist. He was arrested in June 2024 and charged under article 331. In February 2025, a court in Hanoi convicted and sentenced him to two years and six months in prison.

A journalist for Bao Tuoi Tre ("Youth Newspaper") in the late 1980s and the 1990s, Truong earned a reputation as a dogged reporter covering the country's politics.⁸ In 2006, he

⁸ Human Rights Watch news release, "Vietnam: Free Prominent Journalist," June 7, 2024, <https://www.hrw.org/news/2024/06/07/vietnam-free-prominent-journalist>. See also, Human Rights Watch dispatch, "Vietnam Targets Independent Journalist," February 25, 2025, <https://www.hrw.org/news/2025/02/25/vietnam-targets-independent-journalist>.

started a popular blog in which he published editorial commentary on pressing social and political issues. The authorities shut it down in 2010. In 2012, Truong published *Ben Thang Cuoc* (“The Winning Side”), widely considered among the most important nonfiction books about postwar Vietnamese history and politics. The book is banned in Vietnam.

Truong frequently discussed Vietnam’s social and political problems, including deforestation and other environmental issues. With more than 350,000 Facebook followers, he remains one of the platform’s most influential Vietnamese political commentators. Prior to his arrest, he posted about the dangers posed by concentrating power in Vietnam’s highly repressive Ministry of Public Security, which To Lam, current general secretary of the Communist Party of Vietnam, formerly led.

In a 2013 interview, Truong said, “no free man would ever choose prison. But, in some cases, to defend a right to freedom, prison cannot be avoided. If everybody avoids prison, we will never achieve freedom.”

Tran Dinh Trien

Tran Dinh Trien (born 1959) is a lawyer and a senior Communist Party member. He was arrested in June 2024 and charged under article 331. In January 2025, a court in Hanoi convicted and sentenced him to three years in prison.

According to the indictment, between April 23 and May 9, 2024, Tran published three posts on Facebook criticizing actions by then Chief Justice Nguyen Hoa Binh of the Supreme People’s Court of Vietnam.⁹ Also according to the indictment, the court issued a statement that these posts “had untruthful and fabricated content that aimed to seriously offend the dignity, honor and prestige of Chief Justice Nguyen Hoa Binh ... and seriously affect the prestige of the People’s Court system.”¹⁰

In one of the posts that Human Rights Watch reviewed, Tran had noted that on Chief Justice Nguyen’s watch, the courts had prevented family members of defendants from attending trials. Tran criticized the chief justice’s decision to prohibit journalists and lawyers from video recording at open trials. Tran’s post also criticized the chief justice for ruling

⁹ People’s Supreme Procuracy, Indictment of Tran Dinh Trien, No. 10463, issued November 11, 2024.

¹⁰ Ibid.

against a death row inmate, Ho Duy Hai, despite considerable evidence of irregularities during the investigation of the case.¹¹

Tran heads the Vi Dan (“For the People”) Law Firm, which he founded in 2006. He was also the deputy chair of the Hanoi Bar Association from 2013-2018. In 2011, he participated in the defense team for activist Cu Huy Ha Vu, and joined fellow lawyers when they staged a walk-out during the trial to protest against unfair treatment of the defense team.¹² In 2013, he represented one of the defendants in a well-known case in which several family members fought off an unlawful eviction with homemade guns and mines.¹³

Hoang Van Luan

Hoang Van Luan (born 1988) is a land rights petitioner from Ky Tay commune, Ky Anh district, Ha Tinh province who in March 2024 was sentenced to two and a half years in prison for violating article 331.

In the early 2010s, during a state economic development project, local authorities confiscated land from his family and other farmers in Ky Tay commune.¹⁴ Dissatisfied with the government’s compensation offer, Hoang Van Luan filed multiple complaints. In 2018 and 2019, he and other farmers went to file petitions at the district and province level to no

¹¹ Radio Free Asia, “Vietnam’s Top Court Rejects Request to Reinvestigate Death-row Inmate’s Case,” May 11, 2020, <https://www.rfa.org/english/news/vietnam/rejection-05112020184601.html> (accessed March 27, 2025). See also, “Key developments in the case of Ho Duy Hai (Cac dien bien chinh cua vu an Ho Duy Hai),” *Luat khoa* (Law), December 2014, <https://www.luatkhoa.com/2014/12/cac-dien-bien-chinh-cua-vu-an-ho-duy-hai-lien-tuc-cap-nhat/> (accessed March 27, 2025).

¹² Human Rights Watch report, “Vietnam: The Party vs. Legal Activist Cu Huy Ha Vu,” May 26, 2011, <https://www.hrw.org/report/2011/05/26/vietnam-party-vs-legal-activist-cu-huy-ha-vu>.

¹³ Reuters, “Vietnam farmer jailed for military-style defense of land,” April 5, 2013, <https://www.reuters.com/article/lifestyle/vietnam-farmer-jailed-for-military-style-defense-of-land-idUSBRE934oBL/> (accessed March 27, 2025). See also, “The government was completely wrong in the Tien Lang case (Chinh quyen sai toan dien trong vu Tien Lang),” *VnExpress*, February 10, 2012, <https://vnexpress.net/chinh-quyen-sai-toan-dien-trong-vu-tien-lang-2222318.html> (accessed March 27, 2025).

¹⁴ P. Quan, “Taking advantage of the rights to freedom and democracy to file complaints for a long time and beyond [local] levels (Loi dung quyen tu do dan chu de khieu kien keo dai, vuot cap),” *Cong an Nhan dan*, September 5, 2023, <https://cadn.com.vn/loi-dung-quyen-tu-do-dan-chu-de-khieu-kien-keo-dai-vuot-cap-post282950.html> (accessed March 27, 2025).

avail.¹⁵ He then went to Hanoi and filed petitions at the central level, also to no avail.¹⁶ He posted video clips of these protests on Facebook.

Hoang Van Luan is also a grassroots social activist. In May 2022, he was selected to be a representative for the Ho Chi Minh Communist Youth League at Ky Tay commune for a 2022-2027 term. In March 2021, he attempted to run for the People's Council at Ky Tay commune, term 2021-2016, as an independent candidate – which requires the approval of local government officials.¹⁷ But the local officials did not choose him.

The police of Ky Anh district arrested Hoang Van Luan in August 2023 and charged him under article 331. According to the police, “since 2018, Hoang Van Luan had incited Ha Tinh people to file petitions that resulted in 18 trips with the total number of 981 rounds of people to go and file complaints at the commune, district, province and central levels, causing a complicated situation for security and order.”¹⁸

In March 2024, after a trial that lasted several hours, a court in Ha Tinh province convicted and sentenced Hoang Van Luan to two years and six months in prison. He did not have a defense lawyer. According to the court file, at this trial, the three alleged victims of his criminal offense – the People's Committee of Ha Tinh province; the National Assembly representatives of Ha Tinh province, and the People's Committee of Ky Anh district – were absent. The court reported that there were 36 witnesses, but none appeared at the trial.¹⁹

¹⁵ Ibid. See also, Le Minh, “Initiate a case against a man accused of abusing the rights to freedom and democracy to infringe upon the interest of the state (Khoi to bi can loi dung quyen tu do dan chu xam pham loi ich Nha nuoc),” *Tuoi tre* (Young Age), August 23, 2023, <https://tuoitre.vn/khoi-to-bi-can-loi-dung-quyen-tu-do-dan-chu-xam-pham-loi-ich-nha-nuoc-20230823221332552.htm> (accessed March 27, 2025).

¹⁶ Ibid. See also, Hoang Van Luan's post on social media, August 6, 2018, <https://www.facebook.com/luan.hoangvan/posts/pfbido2Pc3qqL48qdVGUX7pVGHzZuW1DP8ouTLtyTjcxUsPiRADBgjk6YyKBwWgQY26T5dl> (accessed March 27, 2025).

¹⁷ Hoang Van Luan's post on social media, March 9, 2021, <https://www.facebook.com/luan.hoangvan/posts/pfbidonCTn98NwwGmDJFhnFLTKp669AeZRNT3W9GdP6DSFDjB8vQUaNs2eGXY5emP7G8p9l> (accessed March 27, 2025).

¹⁸ P. Quan, “Taking advantage of the rights to freedom and democracy to file complaints for a long time and beyond [local] levels (Loi dung quyen tu do dan chu de khieu kien keo dai, vuot cap),” *Cong an Nhan dan*, September 5, 2023, <https://cadn.com.vn/loi-dung-quyen-tu-do-dan-chu-de-khieu-kien-keo-dai-vuot-cap-post282950.html> (accessed March 27, 2025).

¹⁹ Court verdict No. 05/2024/HSST, March 14, 2024.

Danh Minh Quang

Danh Minh Quang (born 1987) is an ethnic Khmer truck driver from Soc Trang province. In February 2024, Danh Minh Quang was sentenced to three and a half years in prison for violating article 331.

According to the police, from July 2021 until his arrest on July 31, 2023, Danh Minh Quang posted statements on Facebook and livestreamed them, accusing local authorities of abuses and suppressing Khmer Krom people – ethnic Khmer who live in Vietnam’s Mekong Delta region.

Among the posts that the authorities alleged to be criminal, Danh Minh Quang allegedly accused the government of withholding aid from many Khmer Krom during the Covid-19 pandemic.²⁰ In one of the posts cited in the court decision, Danh Minh Quang wrote: “What I posted was accurate, but you guys remained silent. I denounce cadres who are corrupt and who brutally beat up people. I hope cadres from the Central level will come to investigate and help solve my problem.”²¹ He accused the authorities of “robbing and silencing the people.”²² He asked his audience to share his posts and accused the authorities of intimidating people during the pandemic, while not wearing masks themselves. He wrote: “The police of Dai Tam commune took a bribe and arrested me at nighttime without any arrest warrant, causing me to lose my job and my spirit. I hope the higher-ups will come here and help me solve this problem.”²³

The authorities charged Danh Minh Quang with “frequently sharing posts, images and videos with bad and poisonous contents” from others, including the Voice of Kampuchea Krom-VOKK, which the Vietnamese government viewed as a hostile foreign organization, and To Hoang Chuong, a Khmer Krom activist from Tra Vinh province. The police arrested To Hoang Chuong on July 31, 2023.

The authorities also accused Danh Minh Quang of “collecting summonses to the police station” and then posting and livestreaming them on social media, “accompanied by false

²⁰ Court Verdict 06/2024/HS-ST, February 7, 2024.

²¹ Ibid.

²² Ibid.

²³ Ibid.

speech and posts, distorting and insulting the prestige and honor of the police of Dai Tam commune, and slander Vietnam of violating democracy and human rights.”²⁴ Among the ostensible evidence that the police confiscated during Danh Minh Quang’s arrest were the UN Declaration on the Rights of Indigenous People, and t-shirts with logos of the Khmer Krom flag.

Danh Minh Quang’s trial took place on February 7, 2024, in My Xuyen district, Soc Trang province. The court convicted him of violating article 331 and sentenced him to three and a half years in prison. The court also ordered the confiscated evidence to be destroyed.

Nay Y Blang

Nay Y Blang (born 1976) is an ethnic Ede religious activist and a former political prisoner who lives in Song Hinh district, Phu Yen province. Nay Y Blang was convicted of violating article 331 in January 2024 and sentenced to four and a half years in prison.

In 2005, Nay Y Blang was sentenced to five and a half years in prison for “undermining national unity” under article 87 of the 1999 penal code. At the time, the authorities frequently employed article 87 (now article 116) to punish people from ethnic minority groups affiliated with independent religious or social groups.²⁵ In 2012, soon after Nay Y Blang completed his prison sentence, he was sent to a reeducation camp for two years for “abusing the rights to freedom and democracy and the rights to freedom of belief...in order to infringe upon the interests of the State.” Nay Y Blang allegedly participated in the Central Highlands Evangelical Church of Christ, a religious group that the Vietnamese government does not recognize.

The Vietnamese government restricts religious practice through legislation, registration requirements, harassment, and surveillance.²⁶ Religious groups are required to gain approval from and register with the government as well as operate under government-controlled management boards. While authorities allow many government-affiliated

²⁴ Ibid.

²⁵ Human Rights Watch, World Report Chapter Vietnam, January 2013, <https://www.hrw.org/world-report/2013/country-chapters/vietnam>.

²⁶ Human Rights Watch, Submission to the Universal Periodic Review of Vietnam, October 3, 2023, <https://www.hrw.org/news/2023/10/03/submission-universal-periodic-review-vietnam>.

churches and pagodas to hold worship services, they regularly ban religious activities they arbitrarily deem to be contrary to the “national interest,” “public order,” or “national unity.” The government labels Dega Protestant, Ha Mon Catholic, Falun Gong, and other religious groups as *ta dao* (“evil religion”) and harasses those who practice those beliefs.

The police monitor and sometimes violently crack down on religious groups operating outside government-controlled institutions. Unrecognized independent religious groups face constant surveillance, harassment, and intimidation, and their followers are subject to public criticism, forced renunciation of faith, detention, interrogation, torture, and criminal prosecution. As of September 2021, Vietnam acknowledged that it had not officially recognized about 140 religious groups in the country with approximately one million followers.²⁷

In August 2022, Nay Y Blang met with American diplomats from the US Consulate in Ho Chi Minh City to discuss the persecution of independent religious groups in Vietnam. In September, he tried to leave Phu Yen province for a meeting with a US religious delegation in Ho Chi Minh City, but local police detained him at a bus station, and forced him to return home.

Police placed Nay Y Blang under intrusive surveillance and subjected him to constant harassment, intimidation, public criticism, and interrogation. They broke up religious prayer sessions at his house and confiscated his belongings. In May 2023, the police arrested him.

According to the Vietnamese authorities, from the end of 2019 to 2022, Nay Y Blang continued to participate in the Central Highlands Evangelical Church of Christ; he frequently used his private house for followers to gather, pray, and carry out online communion with key figures of the church. The authorities accused him of:

repeatedly provid[ing] false information about freedom of belief and religion ... to foreign individuals and organizations who reported and wrote

²⁷ Do Xuan An, “Identifying activities of taking advantage of religious issues against the Party and State of Vietnam (Nhan dien hoat dong loi dung van de ton giao chong Dang, Nha nuoc Viet Nam),” *Cong an Nhan dan* (the People’s Public Security), January 15, 2022, <https://cand.com.vn/Chong-dien-bien-hoa-binh/nhan-dien-hoat-dong-loi-dung-van-de-ton-giao-chong-dang-nha-nuoc-viet-nam-i644111/> (accessed March 27, 2025).

articles that distort [Vietnam's] religious policy and infringe upon the interests of the State of the Socialist Republic of Vietnam.

The government chided Nay Y Blang for “not repenting” and for “continuing to take advantage of religious issues” to cause trouble. In January 2024, a court convicted and sentenced him to four years and six months in prison.

Dao Ba Cuong

Dao Ba Cuong (born 1961) is an iron worker who lives in the town of Tuy Hoa, Phu Yen province. He was arrested in 2023 for publicly denouncing the police after his son, Dao Ba Phi, died in police custody in October 2022. He was subsequently convicted and sentenced to two years in prison in December 2023 for violating article 331.

The police had detained Dao Ba Phi (born 1984) on October 16, 2022 for allegedly stealing a motorbike. They had no arrest warrant. Two days later, Dao Ba Phi died in police detention. According to the police, Dao Ba Phi used a long-sleeve shirt to hang himself from the door of his detention room while in a sitting position. The police claimed that they offered Dao Ba Phi's family the opportunity to be present at the autopsy, but because his family “made a number of requests that were not in accordance with provisions of the law,”²⁸ the offer was withdrawn. The police did not specify what these requests were, and they did not return the body to the family for burial.²⁹ On October 20, two days after Dao Ba Phi's death, his family received two arrest warrants via the post office. The warrants were dated October 16 and October 17, but were postmarked October 18, after Dao Ba Phi had died.

After Dao Ba Phi's death, his family turned their house into a protest site with banners hanging on the walls denouncing the police for his death and demanding a thorough investigation. The family also filed multiple petitions to the government.

²⁸ Viet Tuong, “Initiate a case against and arrest a subject who abuses the rights to freedom and democracy (Khoi to, bat tam giam doi tuong loi dung quyen tu do dan chu),” *Cong an Nhan dan* (the People's Public Security), April 27, 2023, <https://cand.com.vn/Ban-tin-113/khoi-to-bat-tam-giam-doi-tuong-loi-dung-quyen-tu-do-dan-chu-i691657/> (accessed on March 27, 2025).

²⁹ Dao Ba Phi's family members provided a different account. They have said that the police did not allow the family to attend the autopsy, and did not even let the family know where Dao Ba Phi had been buried.

On April 27, 2023, the police arrested Dao Ba Cuong and charged him with “abusing the rights to freedom and democracy” under article 331. In December 2023, Dao Ba Cuong was convicted and sentenced to two years in prison. In his court file,³⁰ the police listed his alleged crime as:

From December 2022 to January 2023, Dao Ba Cuong, father of Dao Ba Phi, did not agree with the responses provided by authoritative offices. He filed petitions to many offices of the Party and the State, and demanded a number of issues to be resolved in relation to the death of Phi. He also wore funeral clothes, carried the deceased photo, and walked through many streets in Tuy Hoa City and walked to the headquarters of many offices of the Party and the State, disrupting public order.

The police also accused Dao Ba Cuong of “inferring things that are not truthful,” wrongfully accusing police officials as “masterminds and accomplices” who killed his son, and fabricating “documents related to the death of Dao Ba Phi and [hanging] these documents in the alley right outside his house... and then livestream[ing] them on Facebook.”

Le Minh The

Le Minh The (born 1963) is a pro-democracy commentator in the city of Can Tho.

Le Minh The discussed socio-political issues including economic development, corruption, poverty, and land rights on social media. He urged people to go online to learn about domestic and international issues. The police in Can Tho arrested him in October 2018 and charged him under article 331. In March 2019, a court convicted and sentenced him to two years in prison.³¹

In February 2023, police arrested him again, and charged him again under article 331. According to official media, between January and November 2022, he livestreamed and shared many posts with “negative contents,” calling for a “multi-party and pluralism

³⁰ Court Verdict No. 111/2023/HS-ST, December 12, 2023.

³¹ Human Rights Watch news release, “Vietnam: 6 Activists Headed to Prison,” March 14, 2019, <https://www.hrw.org/news/2019/03/14/vietnam-6-activists-headed-prison>.

regime and separation of power.”³² In December 2023, a court convicted and sentenced him to two years and six months in prison.

Le Minh The’s younger sister, Le Thi Binh (born 1976), received two years in prison in 2021, also under article 331, for posting, livestreaming, and sharing on Facebook contents that “distort and defame State’s policies, laws and regulations” and “deny all the leadership achievements of the [Communist] Party.”³³

Nguyen Thai Hung and Vu Thi Kim Hoang

Nguyen Thai Hung (born 1972), an electronic repairman, and Vu Thi Kim Hoang (born 1978), a seamstress, lived together at Vu Thi Kim Hoang’s house in Dong Nai province, and were sentenced to four years and two and a half years, respectively, in November 2022 for violating article 331.

In June 2020, Nguyen Thai Hung started a YouTube channel called Speaking the Truth Television (Noi bang thuc TV) to discuss social and political issues. Between 2020 and 2022, he posted about 300 videos and gained about 40,000 subscribers. Among the many topics that Nguyen Thai Hung discussed were Vietnam’s prison conditions, the trial of defendants related to a land dispute, and the modern history of Vietnam’s communist government and its leaders. Vu Thi Kim Hoang never participated in any of the discussions on the YouTube channel.

On the afternoon of May 1, 2022, as Nguyen Thai Hung was livestreaming his show, men wearing the orange uniforms of Vietnam Electricity smashed the windows and broke into the couple’s house.³⁴ The men then took Nguyen Thai Hung and Vu Thi Kim Hoang away without any arrest warrants.

³² Hoang Yen, “Appropriate lessons on the abuse of the rights to freedom and democracy (Nhưng bài học thích đáng về lợi dụng quyền tự do dân chủ),” Bao Can Tho, December 14, 2023, <https://baocantho.com.vn/nhung-bai-hoc-thich-dang-ve-loi-dung-quyen-tu-do-dan-chu-a167720.html> (accessed March 27, 2025).

³³ Court file No. 20/2021/HSST, April 22, 2021.

³⁴ Radio Free Asia Vietnamese, “Dong Nai: A couple were arrested amid livestreaming about the communist regime (Dong Nai: Hai vo chong bi bat giam khi dang tren song live stream noi ve che do cong san),” January 10, 2022, <https://www.rfa.org/vietnamese/news/vietnamnews/the-couple-was-arrested-while-on-a-live-stream-talking-about-a-communist-regime-01102022050000.html> (accessed March 27, 2025).

Two days later, when Vu Thi Kim Hoang’s family members inquired at the police, they received a notice of arrest that stated that Vu Thi Kim Hoang had been charged under article 331. Since Nguyen Thai Hung and Vu Thi Kim Hoang were not officially married, the police did not provide her family with any information about him.

According to state media, Nguyen Thai Hung “was caught red-handed by the police of Tan Phu district when he was livestreaming a video on social media to propagandize, distort and fabricate untruthful information, defame the leaders and oppose the Socialist Republic State of Vietnam.”³⁵

The police accused Vu Thi Kim Hoang of “allowing Hung to stay at her place, helping him buy a laptop, taking care of daily food and beverage, [and] letting him use her bank account.”³⁶

According to the case’s court file, the Bureau of Information and Communications of Dong Nai province had examined and concluded that 21 videos that Nguyen Thai Hung had livestreamed had “contents that propagandize, distort and defame the people’s administration; ... fabricate and distort the truth, causing confusion among the people; seriously insult the great leader [Ho Chi Minh] and the country leaders; [and] oppose the State of the Socialist Republic of Vietnam.”³⁷

The videos are no longer available on YouTube.

Vu Thi Kim Hoang and Nguyen Thai Hung initially hired the lawyer Nguyen Van Mieng to defend their cases, but according to independent media reports, changed their minds under police “persuasion,” a euphemism for intimidation.³⁸

³⁵ Quynh Trang, “The People’s Court of Dong Nai province put two defendants on trial for Abusing the rights to freedom and democracy in order to infringe upon the interests of the State, the legitimate rights and interests of organizations and individuals (Toa an Nhan dan tinh Dong Nai xet xu o2 bi cao Loi dung cac quyen tu do dan chu xam pham loi ich Nha nuoc, quyen, loi ich hop phap cua to chuc, ca nhan),” Cong an Dong Nai (the Police of Dong Nai province), March 30, 2023, <https://congan.dongnai.gov.vn/Pages/newsdetail.aspx?NewsId=16487&CatId=94> (accessed March 27, 2025).

³⁶ Ibid.

³⁷ Court file No. 104/2023/HS-PT, March 29, 2023.

³⁸ Radio Free Asia Vietnamese, “Dong Nai: A couple were found guilty of ‘abusing the rights to democracy and freedom’ in a trial without defense lawyers (Dong Nai: Hai vo chong bi ket toi ‘loi dung quyen tu do dan chu’ trong phien toa khong luat su),” November 22, 2022, <https://www.rfa.org/vietnamese/news/vietnamnews/dong-nai-couple-convicted-of-abusing-democratic-rights-in-a-trial-without-lawyer-11222022065815.html> (accessed March 27, 2025).

On November 22, 2022, during a trial without defense lawyers, a court in Tan Phu district, Dong Nai province convicted Nguyen Thai Hung and Vu Thi Kim Hoang of “abusing the rights to democracy and freedom in order to infringe upon the interests of the state.” The court sentenced Nguyen Thai Hung to four years, and Vu Thi Kim Hoang to two and a half years in prison.

In an interview with Radio Free Asia, Vu Thi Kim Hoang said that, “during the [initial] trial, we were not allowed to argue [our case]. Almost the entire time they only asked us to say yes or no, or confirm a fact. We did not have any lawyers. We were not allowed to say much.”³⁹

Both defendants immediately appealed the verdicts. They hired two defense lawyers, but one of them was not allowed access to their files until a few days before the trial.⁴⁰ During the appeal trial on March 29, 2023, defense lawyer Nguyen Van Mieng pointed out that defendant Nguyen Thai Hung “was only informed of the [police] assessment conclusion” regarding the content of his livestreaming, but not any concrete examples of what he said or did. Nguyen Thai Hung said that he did not violate the law but “only exercised his rights to freedom of expression enshrined in the Constitution.”

Upon being allowed to make a last statement before the appeal verdict, Nguyen Thai Hung said, “Jurors, please judge so that I and other Vietnamese can enjoy basic freedoms as people in other countries do, so that the society of Vietnam will become better.”⁴¹

The appeal court upheld the verdicts of the first instance court. Nguyen Thai Hung and Vu Thi Kim Hoang have been serving their prison sentences.

³⁹ Ibid.

⁴⁰ On March 22, 2023, defense lawyer Nguyen Van Mieng wrote on his Facebook account, “One week before the appeal trial of Speaking the Truth Television case is scheduled, and yet their defense lawyer has not been allowed to read their case file. If the court does not allow their defense attorney to examine and copy the file, we will have no choice but to ask for a postponement [of the appeal trial].” The court eventually granted him access to his defendant’s file.

⁴¹ Defense lawyer Nguyen Van Mieng’s post on his Facebook account, March 29, 2023, <https://www.facebook.com/nguyenvan.mieng/posts/pfbido28GEpfgeoZirQGS4BguQBgfbaGo61UgGKBfoVzyTm37cYLb8prxWKAHjbxJWoanp4l> (accessed March 27, 2025).

Shortly after the appeal trial, defense lawyer Nguyen Van Mieng himself faced risk of arrest under the same charge as his clients. He fled to Bangkok, and in June 2023 immigrated to the United States where he sought asylum.

Le Chi Thanh

Le Chi Thanh (born 1983) is serving two consecutive prison terms: a two-year sentence for “resisting persons on public duty” in violation of article 300 and a three-year sentence for reporting on government corruption through livestreams and videos posted on social media in violation of article 331.

Le Chi Thanh was a police captain at the notorious Z30D prison in Binh Thuan province. In the early 2020s, he began to livestream on YouTube and Facebook to denounce his supervisor, Col. Le Ba Thuy, for mismanagement of money and other forms of corruption. He called for a thorough, impartial, and transparent investigation into his allegations. Le Ba Thuy was the chief of Z30D prison, and also served as general secretary of the Communist Party cell there.

In July 2020, the Ministry of Public Security disciplined Le Chi Thanh and fired him from the police force. Le Chi Thanh filed appeals against the decision, to no avail. He embarked on an effort to expose corruption among the traffic police.

In November 2020, Le Chi Thanh said during a livestream on YouTube: “If I want the bad things to cease to exist, I must fight against them. My mother cried a lot, but I cannot abandon my thoughts and the path I chose.”⁴²

In March 2021, traffic police in Ho Chi Minh City fined Le Chi Thanh and towed his car for an alleged traffic violation. He challenged them by livestreaming the encounter on Facebook, and demanded they provide information on the legal basis for their action. During a meeting three days later to reclaim his car, Le Chi Thanh again livestreamed the encounter between him and the police. In April 2021, police arrested Le Chi Thanh and charged him with resisting persons on public duty under article 300 of the penal code.

⁴² “Le Chi Thanh denounced leaders at Thu Duc prison (Le Chi Thanh to cao lanh dao trai giam Thu Duc),” November 4, 2020, <https://www.youtube.com/watch?v=ndvC9D6sjQ4> (accessed March 27, 2025).

In October 2021, during a meeting between Le Chi Thanh and defense lawyer Dang Dinh Manh, in front of two government officials, including police officer Le Duc Nghia and People's Procuracy member Le Thi Hanh, Le Chi Thanh told the lawyer that police had tortured him during detention. According to blogger Tuan Khanh on Radio Free Asia, he reported that "his hands and legs were hung for seven days. All activities including eating, drinking, and going to the toilet was done on [that] spot with him being hung."⁴³ He further stated that "he can only use three fingers on each hand, and lost all feeling on the other four fingers. He also feels numb in his leg. Both his hands and feet have scabies."⁴⁴

In January 2022, a Thu Duc city court convicted and sentenced Le Chi Thanh to two years in prison. His mother told a Voice of America reporter that during the trial, Le Chi Thanh stated that he was tortured, but the court ignored it.⁴⁵ A photo circulated showing Le Chi Thanh so weak that two police officers had to help him walk into the courtroom.⁴⁶

In February 2022, Le Chi Thanh was slapped with an additional charge of "abusing the rights to freedom and democracy in order to infringe upon the interests of the state, the legitimate rights and interests of organizations and individuals" under article 331. The prosecution relied on a number of videos posted by Le Chi Thanh on Facebook as evidence, according to his court file.⁴⁷

In June 2022, a Binh Thuan provincial court convicted and sentenced him to an additional three years in prison under article 331.

⁴³ Tuan Khanh, "Former police officer Le Chi Thanh said he was "brutally tortured in detention center (Cuu cong an Le Chi Thanh noi "bi tra tan da man trong trai tam giam")," *Radio Free Asia*, October 29, 2021, <https://www.rfa.org/vietnamese/news/blog/former-police-officer-said-to-be-tortured-in-prison-10292021131314.html> (accessed October 30, 2021).

⁴⁴ Ibid. See also, Doan Bao Chau's post on social media about Le Chi Thanh, October 30, 2021, <https://www.facebook.com/DoanBaoChau21165/posts/10159399679288965> (accessed October 30, 2021).

⁴⁵ Voice of America, "Former police captain was sentenced to 2 years in prison for "resisting against persons carrying out public duties" (Cuu dai uy cong an bi phat 2 nam tu vi 'chong nguoi thi hanh cong vu')," January 14, 2022, <https://www.voatiengviet.com/a/cuu-dai-y-cong-an-le-chi-thanh-bi-phat-hai-nam-tu/6396829.html> (accessed March 27, 2025).

⁴⁶ Radio Free Asia, "Former police captain Le Chi Thanh will be at an appeal trial on March 31 (Cuu dai uy cong an Le Chi Thanh ra toa phuc tham vao ngay 31/3)," March 16, 2022, <https://www.rfa.org/vietnamese/news/vietnamnews/former-police-captain-turned-activist-le-chi-thanh-to-be-brought-to-appeal-trial-03162022073726.html> (accessed March 27, 2025).

⁴⁷ Court verdict No. 26/2022/HS-ST, June 22, 2022.

Thach Rine

Thach Rine (born 1960) is an ethnic Khmer man living in Tra Cu district, Tra Vinh province.

According to his court file, on June 12, 2021, he posted on Facebook a GIF in which a portrait of Ho Chi Minh quickly evolves into a monster. The GIF was accompanied by a caption in both Khmer and Vietnamese: “This is the boss of thieves.”⁴⁸ Two days later, he took the caption down but kept the GIFs on his social media. On June 18, the police of Tra Cu district confiscated a DVD in which Thach Rine stored the GIFs.

In October 2021, the police arrested Thach Rine and charged him with “abusing the rights to freedom and democracy in order to infringe upon the interests of the state” under article 331. After his arrest, state media claimed that Thach Rine “frequently posted and shared symbols and documents related to a foreign reactionary organization.”

According to the police, Thach Rine admitted to posting the GIFs because he believed that the western region of southern Vietnam originally belonged to Khmer people, and Ho Chi Minh was the mastermind behind the theft of the Khmer people’s land. On January 24, 2022, a court in Tra Cu district convicted and sentenced Thach Rine to six months in prison.

⁴⁸ Court verdict No. 10/2022/HS-ST, January 24, 2022.

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Annex

The following is a list of 124 people in Vietnam who have been convicted and sentenced to prison under article 331 of the penal code between January 2018 and February 2025. Their alleged crimes include expressing critical views of the government, taking part in protests, participating in religious groups not approved by the authorities, advocating for Indigenous rights, and expressing grievances against local authorities.

The list is incomplete, as it only includes charges, arrests, and convictions that Human Rights Watch has been able to document. People are listed by name and year of birth.

1. Truong Huy San (known as Huy Duc; 1962)
2. Mai Diep Thao (1981)
3. Duong Hong Hieu (1978)
4. Nguyen Thanh Huy (1966)
5. Nguyen Dinh Trung (1958)
6. Tran Dinh Trien (1959)
7. Dinh Thi Ngoc Anh (1975)
8. Thach Chanh Ra Da (1990)
9. Duong Khai (1994)
10. Kim Khiem (1978)
11. Nguyen Van Nhon (1956)
12. Duong Thi Xuan (1966)
13. Pham Anh Tien (1974)
14. Nguyen Van Minh (1959)
15. Phan Ngoc Dung (1955)
16. Bui Van Khang (1949)
17. Le Phu Tuan (1972)
18. Tran Minh Loi (1968)
19. Pham Thi Thuy (1979)
20. Pham Thi Vien (1973)
21. Phung Van T (1970)
22. Tran Vuong Viet (1973)

23. Nguyen Manh Thang (1974)
24. Duong Manh Tien (1982)
25. Nguyen Thi Xuyen (1974)
26. Nguyen Thu Hang (1962)
27. Thach Cuong (1987)
28. To Hoang Chuong (1986)
29. Hoang Van Luan (1988)
30. Tran Dac Thang (1980)
31. Tran Van Sy (1957)
32. Dang Thi Han Ni (1977)
33. Danh Minh Quang (1987)
34. Nay Y Blang (1976)
35. Do Tien Ph (1991)
36. Dao Ba Cuong (1961)
37. Le Minh The (1963)
38. Le Thach Giang (1957)
39. Tran Hen (1966)
40. Nguyen Thi Thanh Tuyen (known as Nguyen Phuong Hang; 1971)
41. Dang Anh Quan (1981)
42. Huynh Cong Tan (1994)
43. Nguyen Thi Mai Nhi (1983)
44. Le Thi Thu Ha (1992)
45. Ta Mien Linh (1945)
46. Vu Bich Van (1971)
47. Ong Thi Thuy (1963)
48. Vu Thi Nga (1965)
49. Trinh Thi Sang (1960)
50. Ngo Nhu Nghiep (1970)
51. Hoang Khuong (1982)
52. Hoang Thi Son (1958)
53. Thai Thi Be (1956)
54. Nguyen Son Lo (1948)
55. Phan Thi Huong Thuy (1959)

56. Nguyen Van Dai (1989)
57. Nguyen Van Tuan (1957)
58. Vu Ngoc Suu (1973)
59. Hoang Van Vuong (1978)
60. Vo Thanh Thoi (1989)
61. Phan Van Phu (1980)
62. Nguyen Thai Hung (1972)
63. Vu Thi Kim Hoang (1978)
64. Dang Nhu Quynh (1980)
65. Le Thi Sau (1977)
66. Le Anh Hung (1973)
67. Le Tung Van (1932)
68. Le Thanh Hoan Nguyen (1990)
69. Le Thanh Nhat Nguyen (1991)
70. Le Thanh Trung Duong (1995)
71. Le Thanh Nhi Nguyen (1998)
72. Cao Thi Cuc (1960)
73. Pham Tan Hoa (1970)
74. Khong Thi Huong (1987)
75. Phan Huu Diep Anh (1961)
76. Le Chi Thanh (1983)
77. Le Van Tu (1960)
78. Phung Thi Nga (1981)
79. Y Wo Nie (1970)
80. Nguyen Quoc Linh (1976)
81. Le Anh Dung (1965)
82. Phan Bui Bao Thy (1971)
83. Nguyen Huy (1977)
84. Nguyen Hoai Nam (1973)
85. Le Thi Thu Huong (1973)
86. Le Minh Tai (1984)
87. Le Trung Thu (1980)
88. Vo Phuong Thuan (1985)

89. Thach Rine (1960)
90. Vo Hoang Tho (1985)
91. Tran Ngoc Son (1965)
92. Bach Van Hien (1987)
93. Truong Chau Huu Danh (1982)
94. Doan Kien Giang (1985)
95. Nguyen Thanh Nha (1980)
96. Nguyen Phuoc Trung Bao (1982)
97. Le The Thang (1982)
98. Phung Thanh Tuyen (1983)
99. Ho Dinh Tung (1964)
100. Y Bi Mlo (1968)
101. Tran Minh Chi (1993)
102. Nguyen Ngoc Tien (1981)
103. Nguyen Thi Thuy (1977)
104. Le Thi Binh (1976)
105. Quach Duy (1982)
106. Le Van Hai (1966)
107. Nguyen Cao Thien (1956)
108. Nguyen Thanh A (1974)
109. Nguyen Dang Thuong (1957)
110. Huynh Anh Khoa (1982)
111. Tran Trong Khai (1989)
112. Nguyen Huu My (1973)
113. Ma Phung Ngoc Phu (1992)
114. Chung Hoang Chuong (1977)
115. Truong Dinh Thoan (1989)
116. Pham Xuan Hao (1965)
117. Nguyen Thi Hue (1968)
118. Quach Nguyen Anh Khoa (1996)
119. Nguyen Duy Son (1981)
120. Nguyen Van Truong (1976)
121. Bui Manh Dong (1978)

- 122. Doan Khanh Vinh Quang (1976)
- 123. Nguyen Hong Nguyen (1980)
- 124. Truong Dinh Khang (1992)

“We’ll All Be Arrested Soon”

Abusive Prosecutions under Vietnam’s “Infringing on State Interests” Law

Vietnamese authorities have long used vaguely worded legal provisions to prosecute and imprison peaceful activists and to crush dissent. These provisions—embedded in particular in Vietnam’s “Infringing on State Interests” Law, article 331 of the penal code—criminalize even modest political activities or expression that the government deems to be a threat.

“We’ll All Be Arrested Soon” documents 10 cases of Vietnamese citizens persecuted under article 331 between 2018-2025. These examples are drawn from 124 documented cases during this period, a significant increase from previous years. The rise in prosecutions under article 331 remains a hidden element of Vietnam’s expanding crackdown on civil and political rights, and is indicative of the country’s rapidly deteriorating human rights situation.

Human Rights Watch calls on the Vietnamese government to promptly repeal article 331 of the penal code, and release all those detained or imprisoned for exercising their fundamental human rights to freedom of expression, association, religion and assembly. The government should also adopt measures to end the arbitrary arrest and detention of peaceful protesters, activists, and government critics. Concerned governments should publicly and privately press Vietnam to immediately release all activists held for peacefully expressing their opinions online, and repeal article 331, and consider imposing targeted sanctions against Vietnamese officials responsible for serious human rights violations.



Dao Ba Cuong, a Vietnamese iron worker from Phu Yen province, staged protests inside his house after his son died in police custody. In April 2023, the police arrested and charged him with “abusing the rights to freedom and democracy” under article 331. Later that year, he was sentenced to two years in prison.

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