Compiling Online Legal Information in Transitional States: Challenges and Opportunities

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COMPILING ONLINE LEGAL INFORMATION IN TRANSITIONAL STATES: CHALLENGES AND OPPORTUNITIES

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Abstract. In transitional states, especially those developing systems of democratic governance, the creation of online, reliable, and accessible legal information systems is a critical component of good governance. When these databases are created, however, there are significant challenges that may arise to achieving a working and sustainable database. Once created, additional opportunities exist for creating better content, educating users, and enhancing the rule of law through open access to laws. This article will address some of the particular challenges and opportunities presented to transitional states when creating an online legal information system, specifically those involving political and social issues from gaining government commitment, the sustainability of databases, surveying users, and developing added and enhanced content for sites.

Keywords: Legal Information Systems, Transitional States, Rule of Law, Internet, Access to Information, Legal Citations

1. Introduction

The dissemination, access, and use of legal information by legal professionals and the public at large are central to the rule of law. In transitional states, especially those developing systems of democratic governance, the creation of online, reliable, and accessible legal information systems is a critical component of good governance. Moreover, this process permeates multiple levels of state development. Meaningful access to legal information has been linked to increasing transparency and accountability in government, (Davies, 2012) and to significantly supporting development of the justice sector. Moreover, increased access to laws and other government information also correlates to reduced rates of corruption and greater citizen participation in governance. The availability of legal information internationally also allows for regional and global investors to navigate the commercial legal system of a state. Finally, openness in governance leads to overall citizen confidence in government, and in turn opens more democratic processes. (Tolbert, 2006)
Unfortunately, the importance of creating online legal information systems\(^1\) and integrating them in the development process is often overlooked. When online legal information systems are created, there are significant challenges to achieving a working and sustainable database. Once created, opportunities arise for improving content, educating users, and enhancing the rule of law through open access to laws. This article will address some of the particular challenges and opportunities presented when creating online legal information systems in transitional states.

Generally speaking, when creating an online legal database from scratch, there are both technical considerations and socio-political considerations to be taken into effect. This paper will focus on the political and social challenges when creating online legal information systems, from gaining government commitment to information production, sustainability of databases, surveying users, and developing added content for sites.\(^2\) In this respect, there are two broad organizational challenges, or priorities, associated with compiling and maintaining online legal information. First, there must be a sustainable organization in place to ensure not only the creation of a database of laws, but also its continuous updating and maintenance. This includes issues such as staffing, funding, and obtaining the political will of governments to freely publicize laws, and takes a government commitment to developing, supporting, and possibly maintaining an online legal information system. Second, after creating an organization to compile laws, questions must be addressed as to how information will be accessed. This involves analysis of the sophistication of users’ research skills and abilities, best practices to design a user interface, and understanding the target audience for the database. These and other such issues will be discussed in turn below.

2. Sustainability Issues and Developing Government Commitment

In order to establish the rule of law in a democratic system, citizens must have access, at the very minimum, to laws of a government. (Darch, 2010) To make this access meaningful, a searchable database of laws should be created to allow users of legal information to find laws based on their particular information need. For this reason alone it is important for governments in transitional states to make a commitment to developing online legal information systems. There are many potential barriers,

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\(^1\) Online legal information systems and legal databases are used herein interchangeably to refer to an online searchable collection of legal information.

\(^2\) For a more complete overview of some technical considerations, see Yates, 2010, which overviews the entirety of the process of creating legal information systems in developing states.
however, to creating an online legal database from scratch. In developing and transitional countries in particular, some challenges have included the “adoption of technology at a slower pace, primarily due to the lack of resources and in some instances, the lack of political will and capacity.” (Yates, 2010)

Despite any existing challenges or political barriers, there is constant pressure for countries to adapt to create or support online systems of laws. In some cases, developing and transitional states must conform to norms of supranational organizations, such as regional organizations of states. In others, donor pressure demands action in the form of creating online databases of laws. (Relly, 2010)

The transition from print to digital legal information has also had a significant impact on transmission of legal information. The former process—from author to publisher to reader—has been described as:

In the old model an author could create content but was not good at quality control, distribution and preservation. Publishers controlled quality and the distribution [and libraries] were good at long-term preservation, bibliographic control, and sharing the content. (Winterton, 2011)

In this way, adequate content control was maintained through the author/publisher relationship, and delivery and preservation of information was well-supported through information organizations. In the digital age, especially in developing states, concerns are more likely to arise about creation, delivery, and preservation of information.

With the proliferation of free online information, there are few gatekeepers to closely monitor quality, distribution, and preservation. Today, governments and other organizations tasked with creating online legal information systems are primarily responsible for the distribution and preservation of this online content, and issues of sustainability and government commitment permeate the process.

Despite the growing importance of creating functioning databases of legal information, and an increased culture of access to information, there are many states that have significant need for improvement of existing systems, or creation of new systems to adequately make available essential legal information. For, if a site is not updated, it ceases to function as a reliable resource. Similarly, if a government does not commit to supporting
an endeavor of compiling legal information, users of information come up short. To that end, the quality of an online database is only as good as its currency and content—two things the state must at the very least assist with.

2.1. GOVERNMENT COMMITMENT TO INFORMATION ACCESSIBILITY

To compile an online database of legal information, there must be a government commitment to produce accurate and updated information. This commitment is especially important in transitional states, trying to develop legitimacy through transparency and accountability. Indeed, the core idea of the access to information in government rests “on the necessity for some citizens to pay attention at least some of the time . . . in order to identify and correct occasional or even frequent instances of incompetence, dishonesty or ignorance in governments.” (Darch, 2010). Citizens, however, must have something to pay attention to in order to hold a government accountable, and in a format that is both accessible and searchable.

One barrier to well-functioning online legal databases is a government’s production of legal information in a timely and responsive manner. This barrier may be slowly eroding, however, based on the global promotion and adoption of access to information laws. By 2006, approximately 120 countries had already passed or had pending access to information laws. (Darch, 2010) In 2009 the Council of Europe adopted the first multinational mandate for adoption of access to information laws for its members. (Council of Europe, 2009) The 2013 Tshwane Principles emphasize this principle as well.

If governments themselves do not already actively promote open information, membership in regional and international organizations may require them to do so. In 2004, for example, at the Special Summit of the Americas, member states signed the Nuevo León Declaration, calling for member states to provide the “legal and regulatory framework . . . to guarantee the right of access to information to our citizens.” (Romero, 2012) Laws enacted as a result of the declaration in member states explicitly require the creation of government websites to deliver government information. (Romero, 2012) The Draft Bill of Rights of the East African Community calls for access to information for every person from all member states, and for states to enact access to information laws. 3 (East African Community, 2009)

3 The Draft Bill of Rights does leave an exception for information that is “likely to prejudice the security and sovereignty of the State.”
Despite the growth of access to information laws, however, the distribution of laws remains a problem in many states. Many governments, even those with open access to information laws, have not published extensive collections of laws online. In one study of eleven countries in the Caribbean Basin, only five countries offered online access to digitized official gazettes, while the remaining six offered limited or no online access. (Romero, 2012) Additionally, the number of government websites publishing legal information varies in the region, with such sites being “scarce” in Cuba and Haiti. (Romero, 2012) Those that provide information often have barriers to access, such as changing web addresses, difficulty finding information, and websites not being updated or taken down entirely. (Romero, 2012)

Therefore, the question of a government’s commitment to access to laws and legal information is one that must be addressed in the development of an online legal database. Partnership with the government institutions responsible for legal information is key to ensure all relevant information is received in a timely manner to include in a database, and is likely a precondition for a successful database.

2.2. COMMERCIAL ALTERNATIVES

While there is a need for government involvement at some level, successful online legal databases need not be state-run. In general, commercial enterprises in developing and transitional states often have a distinct advantage over non-profit and state-run organizations in that they have available capital to fund their activity. This helps alleviate one of the biggest constraints on creating and maintaining online legal information – adequate funding.

The problem of funding legal information databases is widespread. In Moldova, for instance, “sporadic financial assistance is available occasionally” for legal publications, and then generally only from donors. (Harjevschi, 2011) In Nigeria, there has been little impact on the use of the internet to compile online legal information because of “poor infrastructure and inadequate funding.” (Lamikanra, 2011) In Rwanda, Parliament has denied on several occasions in the past two years funding for its Legal Information Portal.4 (Rwanda LIP, 2013)

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4 Information about the currency and funding of the website obtained during interviews with administrators of the project and other research conducted by the Author in 2013.
State experience of poor funding, lack of dependability of donor support, and seldom updated databases can easily lead decision-makers in governments to turn to private agreements to meet requirements of access to information laws, or to otherwise provide legal information. These decisions are not necessarily without merit. In response to financial challenges, some countries have already chosen to privatize legal information, and have entered into publication and distribution agreements with private publishers. (Germain, 2011) One commentator noted that sustainability has been a significant challenge with the free legal database Hong Kong LII. (Zhongyi, 2010) In Indonesia, online legal information is becoming more available, but as recent as 2010 some information was difficult to access due to “a working relationship forged between government officials and commercial publishers.” (Suyudi, 2010)

While commercial databases are attractive solutions to resolving issues of financing, a state’s commitment to access to information should also include a free alternative for online legal information. This is especially critical in transitional states, where a government is trying to establish confidence in government through open and transparent governance. (Tolbert, 2006) To this end, the current trend in most states for the publication of online legal information is a free system, rather than a fee-based system. (Germain, 2011) At a very minimum, governments tend to publish official gazettes online, containing current or recent legislation. (Germain, 2011) To make this information usable, however, governments should pursue publication of this information to web portals or other online legal information systems so users of legal information can better access laws relevant to them.

A useful guide for the creation of online legal information databases is that model created by the LII philosophy, and the Free Access to Law Movement. (WorldLII, 2002) At a minimum, primary sources of law should be made available, online, free of cost. Commercial publishers have successfully worked alongside those promoting reliable and free access to law, by offering editorial content, linking services, and other added content to subsidize free content. (Sutherland, 2013)\(^5\)

When creating online legal information systems in developing and transitional states, emphasis should be placed on the ability to provide certain legal information online for free. Even state-run databases can charge a premium for additional content and added-value features such as

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\(^5\) Sutherland notes that, in response to Canada’s free access to law movement, commercial legal publishers are emphasizing “products designed to be integrated into workflow. For more detail about enhanced content see section 3.3 below.
annotations and linking services. However, to maintain what is soon to be, if not already, a universal norm of access to information, (Tshwane, 2013) states should ensure that certain core legal information is available in a meaningful way online free of charge.

2.3. Uniform Systems of Citation

Regardless of whether an online legal database is run by a state, a non-profit organization, or a for-profit commercial publisher, developing and transitional states should adopt a uniform or neutral system of citation for the publication of legal information. Especially in common law systems, the use of legal citations are critical to develop a growing body of law. Civil law and mixed systems also benefit from accurate and uniform reference to laws and judicial opinions, as citations are a primary tool in legal research.

Citations have been a critical tool in the research of print legal information, and despite advances in technology remain so with electronic information. (Martin, 2012) The normalization of a citation process will have a significant and positive impact on the creating of new online databases as well as the enhancement of existing online catalogs of laws. The use of citations also helps to reinforce a culture of authoritative research, not present in many developing and transitional states.

There has been some success with state adoption of uniform legal citation styles. Canada, for example, started to move toward a uniform system despite an established legal research system and multiple legal publishers. (Mokanov, 2010) In the past, the American Bar Association in the United States has promoted creation of a “universal American citation standard.” (ABA 2003) The American Association of Law Libraries has been a longtime supporter of universal legal citation. (Coggins, 2011) These efforts, however, have not always seen much success. (Eiseman, 2010)

As part of the commitment to produce and make available legal information, states should develop a uniform (non-commercial or neutral) system of citation for laws and other government information.

3. User-Focused Database Design

Establishing a government commitment is a necessary task, but not the only important one in creating an online legal information system in transitional states. Considerations must be made in terms of the primary users and the overall target audience of the database. Additionally, as an
online database of laws in the context of a transitional state serves to strengthen good governance, all potential users, including layperson citizens, must be taken into account.

3.1. UNDERSTANDING PRIMARY USERS OF LEGAL INFORMATION

A necessary step in creating an online database of legal information in any system is understanding the research habits and abilities of its intended users. Some researchers call this process part of a “needs assessment,” or a way of gathering background information necessary to successfully create a workable database.  

(Yates, 2011) Indeed, a significant factor in compiling legal information and designing an appropriate database is that “the interface need[s] to support an end user’s ability to find, retrieve and display documents.” (Shapiro, 2011)

To understand the research needs and ability of primary users, developers must understand how they research. General survey methods can help discover what types of databases legal professionals typically use, what proficiency they have in searching (i.e., Boolean versus natural language searching), and how much research they actually do in practice. Armed with this information, databases should be designed with a user in mind.  

(Sellers, 2012) A recent survey of users in Rwanda found that while 91% of respondents used the online PDF publication of the official gazette, 93% of users regularly used Google.com for legal research. Stunningly, over half of those surveyed regularly used Rwanda’s Legal Information Portal, which at the time of the survey had not been updated for 18 months.  

In a case-study on creating a legal information database in Azerbaijan, primary users had experience with free-text searching in word-processing software, and found a similar feature desirable when creating an online database, leading to database design accounting for that purpose.  

(Shapiro, 2011)

Understanding how current users of legal information research online is significant to creating a usable and intuitive interface for a new database of

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6 Yates and Shapiro note that “every aspect of the legal information system that is ultimately to be implemented flows directly from the findings and conclusions of the needs assessment.”

7 For example, the major commercial databases in the U.S.—Westlaw and Lexis—recently made significant alterations in their databases to adopt a single web interface, much like a simple web search, in response to the general information seeking behavior of their primary users. Sellers and Gragg discuss the merits of the changes in product interface, calling it “the ‘Googleization’ of legal research.” (Sellers, 2012)

8 Survey conducted in 2013 related to law libraries and the use of the internet for legal research in the Republic of Rwanda. Survey results on file with Author.
laws. Therefore to have a meaningful impact on existing users of legal information, their information seeking behavior and abilities should at least be taken into account when designing on online legal information system.

3.2. Citizen Access to Legal Information

As noted above, in any given jurisdiction, there should be at least one free online database of laws. Moreover, this database should have a meaningful way to search legal information, rather than a mere compilation of legal texts or documents. The need for a free online database is especially apparent in transitional states, as providing open access to laws is a critical component of the rule of law. (Darch, 2010) As a result, when starting an online database of laws, especially in a jurisdiction that has none, efforts should be made to make it free, available, and usable by the general public.

Top accommodate the research skills of a layperson, only a basic sophistication should be needed to generally search the database. Requiring complicated Boolean search terms may effectively outmode the site to the public (and even within the justice sector). It has been noted, for example, that more complicated search operators often have many additional costs that should be considered, such as: “end user training and support in the correct use of Boolean searching [which] is extremely difficult, requiring extensive documentation and hands-on individual and group instruction.” (Yates, 2010) This is equally true when considering public users.

Creating online legal information for public use does not mean it should not allow for advanced search terms, and does not necessarily mean it should not have a commercially-driven or fee-based component. Public-private partnerships exist today that provide basic legal information for free, and added editorial content and annotations—more useful to legal professionals—with subscription-based access. (Germain, 2011) For example, in some states, such as Kenya and Bermuda, statutory law is free while case law requires paid subscription access. (Germain, 2011) Norway, through a public-private partnership, has a cost recovery system where most legal information is fee-based, but takes into account legal information needs of the public. (Germain, 2011)

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9 Notably, even the Canadian Legal Information Institute’s CanLII beta site, as of July 2013, has also adopted a single text search interface, moving away from its current default search page allowing users to put in distinct information about the type of information sought.
As noted above, however, the current trend for the publication of online legal information is moving to a free system, rather than a fee-based system. (Germain, 2011) As such, when developing online legal information systems in transitional states, consideration should be made to providing free or cost-supported access to the general public, in a way that a layperson can access information.

3.3. Added-Value Content

In addition to the publication of laws and other relevant government information, online legal information systems can take advantage of including metadata or editorial content to help researchers find and understand the law, and link to other relevant resources. First, a significant amount of information can be taken from government documents to assist with document retrieval, such. Second, editorial content can be created to enhance the usefulness and increase understanding of legal information.

By adding metadata from documents the ability to search, it can enhance the ability to search for legal information. One commentator noted “the more the database contains comprehensive, accurate, consistent and timely added-value features as finding tools, the less need for a sophisticated Boolean searching capability,” and the more likely users will find relevant information. (Yates, 2010) This information includes citations or other unique identifiers, issuing date, effective date, document title, document type, author, legislative history information, and historical notes. (Yates, 2010) With these features present, users can search not only by plain language in the text, but can research or limit results by additional document identifiers and characteristics. (Yates, 2010) Generally this information can be added in a database by someone without the requirement of formal legal training or advanced specialization in laws.

In addition to information already contained in laws and other legal documents, editorial enhancements can be added to increase the value of legal databases. Specifically, the use of editors trained in the law can help create enhancements specifically useful for legal professionals. This content can include merely creating subject-matter categories for laws and judicial opinions. (Yates, 2010) It can also include summaries of legal points made for cases, synopses of laws, and links to other relevant legal information. These enhancements require not only more personnel, but better trained personnel than are otherwise required to compile a database of legal information. Therefore, it is in this area where a public-private partnership model could be used to cover costs of an entire system—by creating fee-based editorial content for a database to supplement free online access to laws. With available funding, state-run entities can also
undertake this process, as long as there is an appropriate investment in personnel. (Yates, 2010)

A unified effort in the development of a transitional state’s legal and justice sector can also encourage this content to be created by bodies issuing laws, judicial opinions, and other information contained in a database. For example, legislatures can classify laws based on subject matter when they are codified, and judges can write syllabi for cases, and include lists of related laws and cases for research purposes. Some jurisdictions already require judges to include a syllabus in judgments, for example, to “summarize the legal principle set forth in the opinion.” (Ohio, 2013) Joyce George notes that while not all jurisdictions require a written syllabus in judicial opinions, “it is a good exercise to write one in each case even if it is not needed.” (George, 2000) Thus, when creating legal databases in transitional states, there should be a determination of what added content, if any, can be provided by drafters of legal documents themselves.

3.4. LOOKING TO OTHER DATABASES AS EXAMPLES

While country-specific considerations and findings of a needs assessment are important drivers for decisions related to creating an online legal database, sites from similarly-situated countries should also be examined. In transitional states, guidance from neighboring states and others with similar legal systems and socio-economic conditions can be useful. To some extent, looking to databases in more developed legal systems can also give important insight into research habits and best practices, insofar as they fit within the context of a particular state’s needs and its users’ research abilities.

One useful place to start is with the Legal Information Institutes, and the World LII. These provide strong examples of usable interfaces while promoting free and open access to laws, both important components in creating legal information systems in transitional states. Additionally, partnership between LII organizations has helped developing in other states. For example, LII of India has received technical assistance from AustLII, aiding in its overall sustainability. (Greenleaf, 2011)
4. Additional Considerations for Creating Databases in Transitional States

In addition to securing government commitment and understanding the needs of users of information, there are other opportunities to increase user capacity and promote the rule of law. Online legal information systems can help develop research skills by providing sponsored access to other online legal information, and by promoting information literacy. Additionally, by providing access in multiple mediums or in multiple technological platforms, a wider access to laws by citizens can be achieved.

4.1. LINKING TO OTHER RESOURCES

Globally, the use of international and comparative law in is more important now than ever. (Winterton, 2011) Practitioners at all levels are finding more and more that they need to be aware of international aspects of litigation. (Winterton, 2011; Dejamatt, 2010) For example, judicial interpretation of constitutional rights in South Africa requires comparative analysis. (Winterton, 2011) Additionally, countries joining regional and supra-national organizations must not only harmonize laws to regional agreements, but understand domestic law of member states. (EAC, 2007) By including links to existing free legal databases, potentially relevant legal information can be more easily accessed. Additionally, endorsement of reliable sources can help reinforce practices of information literacy of legal researchers, discussed below.

Links to pathfinders and research aides from other information institutions can also assist with unique and subject-specific research. Academic law libraries and other information organizations often provide free access to guides to find information. 10 (Georgetown, 2013) Some institutions even create research guides specifically for finding reliable and free legal information online. 11 By connecting users to additional reliable online legal information databases can instantly expand the wealth of available legal information to users as little or no cost.

4.2. PROMOTING INFORMATION LITERACY

Information literacy generally refers to the ability to find, understand, and evaluate information. One accepted definition states:

10 The Georgetown Law Library, for example, offers dozens of research guides based on subject and jurisdiction, and often directing researchers to free sources of information in addition to fee-based sources.
11 The Boston College Law Library and the UCLA Law Library, among others, offer research guides specifically for reliable and free online legal information resources.
Information literacy is the adoption of appropriate information behavior to identify, through whatever channel or medium, information well fitted to information needs, leading to wise and ethical use of information in society. (Webber, 2003)

Library and information organizations around the world continue to recognize this important concept, and the challenges presented by the increasing amount of digital information available to information seekers. (Bird, 2011; Johnson, 2009) Because the role of information literacy in the law is a newer concept in developing countries, (Bird, 2011) creating online legal databases presents unique opportunities to reinforce good research behaviors.

One recent study has shown that a startling amount of legal researchers in developing states primarily use sites like Google, Bing, and Yahoo for legal research. Combined with other online information, there is an increasing danger for questionable, unreliable, or even false information to be used in research. One commentator has noted that in the digital age of legal information, now more than ever information “requires guarantees of authenticity and authoritativeness.” (Bird, 2011) Therefore, any online legal information system has an opportunity to encourage the concept of information literacy through promotion and use of the database.

Online databases of legal information can help reinforce information literacy through several ways. For example, it can clearly outline the types of information contained on the site as official legal documents. Additionally, it can link to other reliable sources of legal information, as noted above, reinforcing habits of using legal information sites rather than general search engines for online legal research. In-person and online tutorials when rolling out a new legal information system can also present opportunities for information literacy education.

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12 The 2009 Horizon Report from The New Media Consortium and EDUCASE Learning Initiative noted that a “critical challenge” facing learning organizations is “a growing need for formal instruction in key new skills, including information literacy, visual literacy, and technological literacy.”
13 Survey conducted in 2013 related to law libraries and the use of the internet for legal research in the Republic of Rwanda. Survey results on file with Author.
4.3. DESIGNING FOR MULTIPLE PLATFORMS

When creating an online legal information system, consideration should be given to allowing accessibility on multiple technological devices and in a form not dependent on Internet connectivity. In 2011, global penetration for mobile subscriptions were reported to be at 87% of all people, compared to only one-third of global households having internet access. (Campbell, 2013) Of those, more than three-quarter of all mobile phone subscriptions were based in developing countries. (Pearce, 2013) In some African countries, mobile phone penetration rates rose from as low as 2% in 2000 to more than 90% ten years later. (Bornman, 2012) In sub-Saharan Africa, the mobile phone has become the “key entry point for Internet adoption on the continent.” (Stork, 2012) Already there are cases of successful implementation of mobile governance solutions in developing and transitional countries. (Hellström, 2012) As a result of mobile connectivity being a preferred and sometimes only means of Internet connectivity, online legal information systems should take advantage of optimizing platforms for use on mobile devices.

At the same time as mobile devices are dramatically increasing access to online information in developing states, internet penetration overall remains startlingly low. In a study from June 2012, internet penetration in the Middle East and Latin America was only between 40% and 42% of the population. (Hellström, 2012) Countries in Asia only reported internet penetration at 27.5%, and in Africa only 15.6% of the population of countries reported had access to the internet. (Hellström, 2012) For this reason, alternative access to online databases should be considered, whether on CD-ROM or some other cost-effective portable device. In a needs assessment of creating a legal information system in Azerbaijan, for example, it was found that users requested database information available on CD-ROM so it would be readily accessible on their computers without the use of the Internet. (Shapiro, 2011) Having a database offline also will aid with training in remote areas of states without internet access. (Shapiro, 2011)

While an added cost of design, production, and distribution may be involved, creating a legal information system in multiple platforms—online and offline—will ensure accessibility for all users of legal information in a state. This too is critical in the context of transitional states, to ensure availability and accessibility to laws.
5. Conclusion

Transitional states face many issues establishing good governance and the rule of law. These challenges range from rebuilding government institutions to restoring citizens’ trust in government. In many areas the presence of an online legal information system can enhance these development efforts. Online legal information systems help institutional development through capacity building in all areas of the justice sector, and by promoting transparency through access to laws. These systems can also help economic development by promoting integration of laws and access to commercial laws by regional and international investors. Close consultation with and active involvement by governments, therefore, is key for the development and sustainability of online legal information systems. Additionally, considering information needs and abilities of all intended users will help create a lasting system that will not only serve legal information needs, but will also aid in many areas of transitional governance and the rule of law.


Martin, Peter (2012), *Introduction to Basic Legal Citation (online ed.)*, available at: www.law.cornell.edu/citation/front.htm (accessed July 31, 2013).


