**FOLLOW-UP FACTSHEET OF REPORT No. 80/11**

**CASE 12.626**

**JESSICA LENAHAN (GONZALES)**

**(United States)**

1. **Summary of Case**

|  |
| --- |
| **Victim (s):** Jessica Lenahan (Gonzales)  **Petitioner (s):** Human Rights Clinic of the University of Miami School of Law, American Civil Liberties Union, RFK Center for Justice & Human Rights  **State:** United States  **Merits Report No.:** [80/11](http://www.oas.org/en/iachr/decisions/2011/USPU12626EN.doc), published on July 21, 2011  **Admissibility Report No.:** [52/07](http://cidh.org/annualrep/2007eng/USA1490.05eng.htm), adopted on July 24, 2007  **Themes:** Gender Based Violence / Investigation and Due Diligence / Domestic Effects / Right to Life / Right to Humane Treatment / Right to Equal Protection / Right to a Fair Trial / Judicial Protection / Rights of the Child.  **Facts:** Thiscase refers to acts of violence perpetrated against Jessica Lenahan and her daughters by the ex-husband of the former and the father of the latter, even though Ms. Lenahan held a restraining order against him. The police failed to adequately respond to Jessica Lenahan’s repeated and urgent calls over several hours reporting that her estranged husband had taken their three minor daughters (ages 7, 8 and 10) in violation of the restraining order, and asking for help. The three girls were found shot to death in the back of their father’s truck after an exchange of gunfire between their father and the police which resulted in the father’s death. The State never duly investigated or clarified the circumstances of the death of Jessica Lenahan’s daughters, and never provided her with an adequate remedy for the failures of the police.  **Rights violated:** The Commission concluded that the State failed to act with due diligence to protect Jessica Lenahan and Leslie, Katheryn and Rebecca Gonzales from domestic violence, which violated the State’s obligations not to discriminate and to provide for equal protection before the law under Article II of the American Declaration. The State also failed to undertake reasonable measures to protect the life of Leslie, Katheryn and Rebecca Gonzales in violation of their right to life under Article I of the American Declaration, in conjunction with their right to special protection as children under Article VII of the American Declaration. Finally, the Commission finds that the State violated the right to judicial protection of Jessica Lenahan and her next-of kin, under Article XVIII of the American Declaration. |

1. **Recommendations**

|  |  |
| --- | --- |
| **Recommendations** | **State of compliance in 2019** |
| 1. Undertake a serious, impartial and exhaustive investigation with the objective of ascertaining the cause, time and place of the deaths of Leslie, Katheryn and Rebecca Gonzales, and to duly inform their next-of-kin of the course of the investigation. | Pending compliance |
| 2. Conduct a serious, impartial and exhaustive investigation into systemic failures that took place related to the enforcement of Jessica Lenahan’s protection order as a guarantee of their non-repetition, including performing an inquiry to determine the responsibilities of public officials for violating state and/or federal laws, and holding those responsible accountable. | Pending compliance |
| 3. Offer full reparations to Jessica Lenahan and her next-of-kin considering their perspective and specific needs. | Pending compliance |
| 4. Adopt multifaceted legislation at the federal and state levels, or reform existing legislation, making mandatory the enforcement of protection orders and other precautionary measures to protect women from imminent acts of violence, and create effective implementation mechanisms.  These measures should be accompanied by adequate resources destined to foster their implementation; regulations to ensure their enforcement; training programs for the law enforcement and justice system officials who will participate in their execution; and the design of model protocols and directives that can be followed by police departments throughout the country. | Partial compliance |
| 5. Adopt multifaceted legislation at the federal and state levels, or reform existing legislation, including protection measures for children in the context of domestic violence. Such measures should be accompanied by adequate resources destined to foster their implementation; regulations to ensure their enforcement; training programs for the law enforcement and justice system officials who will participate in their execution; and the design of model protocols and directives that can be followed by police departments throughout the country. | Partial compliance |
| 6. Continue adopting public policies and institutional programs aimed at restructuring the stereotypes of domestic violence victims, and to promote the eradication of discriminatory socio-cultural patterns that impede women and children’s full protection from domestic violence acts, including programs to train public officials in all branches of the administration of justice and police, and comprehensive prevention programs. | Partial compliance |
| 7. Design protocols at the federal and state levels specifying the proper components of the investigation by law enforcement officials of a report of missing children in the context of a report of a restraining order violation. | Partial compliance |

1. **Procedural Activity**
2. The IACHR issued a press release on August 17, 2011 informing that the Merits Report in Case 12.626 Jessica Lenahan (Gonzales) had been published.[[1]](#footnote-1)

1. The IACHR held working meetings with the parties on March 24, 2012 (144th Period of Sessions), July 18, 2012, November 3, 2012 (146th Period of Sessions), October 30, 2013 (149th Period of Sessions) and January 30, 2014 regarding the follow-up of the recommendations issued in Merits Report No. 80/11.
2. On October 27, 2014, the IACHR held a public hearing during its 153rd Period of Sessions, with the participation of the parties and the then United Nations Special Rapporteur on Violence against Women, regarding the follow-up of the recommendations issued in Merits Report No. 80/11.[[2]](#footnote-2)
3. On April 7, 2015, the Human Rights Clinic and Human Rights Institute of Columbia Law School withdrew as representatives from the present case.
4. In 2019, the IACHR requested updated information on compliance from the State on July 11, and the State responded on September 11.
5. The IACHR requested updated information on compliance from the petitioners on July 11, 2019. As of the closing date of this report, the Commission had not received said information from the petitioner.
6. **Analysis of the information presented**
7. The Commission considers that the information submitted by the State in 2019 is irrelevant, given that it is repetitive of the information presented in previous years, without presenting new information on compliance with at least one of the recommendations issued in Merits Report No. 80/11.
8. The petitioner did not present information in response to the Commission’s request for updated information on compliance in 2019.
9. In this sense, because of the lack of updated information on the level of compliance with the recommendations, the IACHR reiterates the analysis of compliance and the conclusions made in its 2018 Annual Report.
10. **Analysis of compliance with the recommendations**
11. **With regard to the first recommendation**,in 2012, the State informed that it had sent three letters to state and local authorities in Colorado about the Commission’s Merits Report, but it had not received any response from these authorities.[[3]](#footnote-3) At the hearing held during the IACHR’s 153rd Period of Sessions, the State reiterated the limitations of the U.S. federal system in relation to investigating the deaths of Jessica Lenahan’s daughters.[[4]](#footnote-4) In 2019, the State reiterated its earlier responses, without presenting new information on actions adopted to comply with this recommendation.
12. In 2013, the petitioners informed that the three letters sent by the Federal Government to state and local authorities did not offer specific guidance or actionable recommendations to officials in regard to this or any other recommendation. In 2014, the petitioners presented to the IACHR the forensic analysis undertaken in 2009, the conclusions of which state the lack of thoroughness in the authorities’ treatment of some parts of the crime scene. The forensic report stated that, as a result of these inadequacies, the time, location and circumstances of the Gonzales children’s deaths remained uncertain. The report further indicated that there appeared to have been an underlying assumption that Simon Gonzales killed Katherine, Rebecca and Leslie Gonzales with the handgun that he purchased and consequently, the investigation into the children’s deaths appeared to have been conducted solely with the aim of confirming this hypothesis. Based on this, the report concluded that the authorities appeared to have approached the homicide investigations of the Gonzales children with preconceived notions that biased the entire process. On August 28, 2014, a Colorado Senator sent a letter to Douglas County District Attorney General requesting an investigation into the children’s deaths. In 2018, the petitioners informed that the U.S. Department of Justice, the State of Colorado and the Town of Castle Rock had made no tangible progress regarding this recommendation. The petitioners informed that they traveled to Colorado with their forensic expert in October 2018 in an attempt to reinitiate the investigations into the girls’ deaths. During this visit, they met with representatives from the Douglas County Sheriff’s Office, the 18th Judicial District Attorney’s Office, the Colorado District Attorneys’ Council and the Denver District Attorney’s Office, and spoke over the telephone with the Castle Rock Town Attorney’s office. The petitioners informed that, during their meeting with the 18th Judicial District Attorney’s Office, they were provided with a list of 23 pieces of forensic evidence that had been retained by the Town of Castle Rock. The petitioners indicated that they were previously unaware of these pieces of evidence despite having made an open records request requesting such information from the Castle Rock Town Attorney’s office. Additionally, the petitioners informed that they had determined that the Colorado Bureau of Investigations (CBI) was the proper agency to conduct an investigation into the girls’ deaths and that the Town of Castle Rock or another Colorado governmental actor should request that the CBI initiate such an investigation. The petitioners stated that they had asked the Town of Castle Rock to request this investigation, but that the Town had refused their request, reiterating its position that the girls were killed by their father.
13. The IACHR recalls that the duty to investigate must be discharged “in a serious manner, not as a mere formality that is doomed to fail from the very beginning and it must pursue a goal and be undertaken by the State as its own legal duty rather than a mere processing of private interests, dependent upon the procedural initiative of the victim or the victim’s next of kin or on the contribution of evidence by private parties, without an actual quest for truth on the part of the public authorities.”[[5]](#footnote-5) The IACHR further reminds the State of Ms. Lenahan’s right to a clarification of what happened to her three daughters and who is responsible for their deaths.[[6]](#footnote-6) Based on this, the Commission finds that Recommendation 1 is pending compliance.
14. **Regarding the second recommendation**, in 2012, the State observed that, even if the Special Litigation Section (SPL) of the Department of Justice’s Civil Rights Division had the authority to investigate a pattern or practice of conduct by a law enforcement agency that systematically violated peoples’ rights, it did not have authority to conduct an investigation into a single incident or into discriminatory conduct affecting an individual. The State added that it had sent three letters to state and local authorities in Colorado about the Commission’s Merits Report, but it had not received any response from these authorities. Moreover, the State informed that the Acting Director of the Office on Violence against Women (OVW) had had several conversations with Castle Rock Chief of Police to explore options to ensure that the Police Department’s policies, protocols and procedures incorporate best practices for domestic violence response.[[7]](#footnote-7) In 2019, the State reiterated its earlier responses, without presenting new information on actions adopted to comply with this recommendation.
15. In 2013, the petitioners reported that the Office on Violence against Women conducted a training session with law enforcement officials of the Castle Rock Police Department.[[8]](#footnote-8) On August 28, 2014, a Colorado Senator sent a letter to Douglas County District Attorney General requesting an investigation into the Castle Rock Police Department’s policing failures in Ms. Lenahan’s case. In 2018, the petitioners informed that the U.S. Department of Justice, the State of Colorado and the Town of Castle Rock had made no tangible progress regarding this recommendation.
16. The IACHR reiterates the inter-American standards related to the duty to investigate set out above in regards to Recommendation 1. Based on this, the Commission finds that Recommendation 2 is pending compliance.
17. **With regard to the third recommendation**, in 2012, the State indicated that it did not have any legal authority to provide funds to Ms. Lenahan and her son absent an act of Congress that so ordered.[[9]](#footnote-9) At the hearing held during the IACHR’s 153rd Period of Sessions, the State reiterated the limitations of the U.S. federal system in relation to providing reparations.[[10]](#footnote-10)
18. In 2012, the petitioners demanded a face-to-face meeting and a public apology, as well as the payment of financial compensation.[[11]](#footnote-11) They also requested that the State explain in detail why it believed that reparations were not available to be paid at the federal, state or local levels.[[12]](#footnote-12) In 2018, the petitioners indicated that the State has not taken actions to comply with this recommendation.
19. The Commission notes with concern that the State has not provided Ms. Lenahan and her next-of-kin with reparations. The Commission reminds the State that it is a principle of international law that any breach of an international obligation resulting in harm gives rise to the duty to adequately redress such harm.[[13]](#footnote-13) In accordance with the jurisprudence of the inter-American system, victims of human rights violations have the right to adequate compensation for the harm suffered, which must materialize into individual measures aimed at restoring, compensating and rehabilitating the victim, as well as measures of satisfaction and guarantees of non-repetition.[[14]](#footnote-14) Further, a State cannot modify or disregard this obligation by relying on its domestic law.[[15]](#footnote-15) Based on the foregoing, the Commission finds that Recommendation 3 is pending compliance.
20. **Regarding the fourth recommendation**, in 2012, the State pointed out that improving the criminal justice response to crimes of violence against women was the core mission of the Office on Violence against Women (OVW), and the issuance and enforcement of protection orders was a significant activity of communities and entities funded by OVW. According to the State, in the six-month reporting period from July to December 2011, jurisdictions receiving funding from OVW granted 301,902 protection orders, and, in direct response to this case, Congress added a new statutory purpose area to the STOP Violence Against Women Formula Grant Program in the Violence against Women Act (VAWA) of 2005. This had allowed states to use STOP funds to place special victim assistants, known as “Jessica Gonzales Victim Assistants,” in local law enforcement agencies, in order to improve the enforcement of protection orders. The State observed that OVW had also implemented a host of training and technical assistance projects aimed at increasing the enforcement of protection orders and improving the response to violence against women, such as the National Center for Full Faith and Credit, Project Passport, the publication of the manual “Civil Protection Orders: A Guide for Improving Practice”, Blueprint for Safety Initiative, Lethality Assessment TA Project, Danger Assessment and Risk Management Training Project.[[16]](#footnote-16) In 2019, the State reiterated its earlier responses regarding the recommendations of Merits Report No. 80/11, without mentioning any efforts undertaken this year in order to comply with them.
21. In 2018, the petitioners informed that Douglas County, which is the county in which Castle Rock is located in Colorado, adopted a lethality assessment program in 2016, through which law enforcement officials evaluate the potential threat to potential victims of domestic violence and, if necessary, subsequently adopt preventive measures to protect women from imminent acts of violence.[[17]](#footnote-17) The petitioners suggested that Castle Rock, Douglas County and the state of Colorado in general could easily build upon this important development by meaningfully implementing the DOJ Guidance into police department policies, practice and public messaging.
22. The Commission values the information presented by the petitioners in 2018 regarding measures adopted by the State to protect women from imminent acts of violence. Based on this, the Commission finds that Recommendations 4 has been partially complied with.
23. **With regard to the fifth recommendation**, in 2012, the State informed that OVW had held a series of focus groups to explore issues around custody and safety for women and children, which resulted in OVW’s decision to undertake a new demonstration initiative: the Family Court Demonstration Initiative (FCDI), the goal of which was to determine what family court procedures, practices and structures related to custody and visitation could help keep victims of domestic violence and their children safe from further violence and trauma.[[18]](#footnote-18)
24. The petitioners have not presented specific information about actions adopted by the State to comply with this recommendation.
25. The Commission notes the information previously presented by the State regarding actions adopted to protect children in the context of domestic violence. However, the Commission notes that the State has not presented detailed and up to date information on actions taken to comply with this recommendation since 2012. Based on this, the Commission finds that Recommendations 5 has been partially complied with.
26. **Regarding the sixth recommendation**, in 2012, the State asserted that the Department of Justice’s Civil Rights Division was committed to addressing gender-based police discrimination and was engaged in a variety of efforts relevant to this recommendation. As an example, the State mentioned the “Gender Discrimination Findings and Recommendations in New Orleans Police Department Consent Decree,” which stemmed from the settlement, in July 2012, regarding the Division’s investigation into the New Orleans Police Department.[[19]](#footnote-19)
27. In 2013, the petitioners informed that on June 20, 2013, the Office of Community Oriented Policing Services, the Office of Victims and Crime, and the Office on Violence against Women of the Department of Justice issued a joint statement on gender discrimination in policing. The statement announced that prevention of sex-based discrimination by law enforcement was a top priority of the Civil Rights Division of the DOJ because of the negative role gender bias plays in the law enforcement response to crimes against women.[[20]](#footnote-20) In 2018, the petitioners informed that the decision of the Commission in Jessica Lenahan’s case had had an undeniable effect on U.S. federal policy and law enforcement. The petitioners indicated that, beginning in 2011, the Department of Justice began stepping up its investigations into discriminatory law enforcement responses to domestic violence and sexual assault in several cities. In 2015, the U.S. Attorney General convened advocates and law enforcement officials to discuss concerns that many victims of domestic violence and sexual assault were reluctant to turn to law enforcement for help, and encountered significant barriers when they did seek law enforcement assistance. Subsequently, the DOJ released the document entitled *Identifying and Preventing Gender Bias in Law Enforcement Response to Sexual Assault and Domestic Violence*, official DOJ Guidance to law enforcement agencies on how to prevent gender bias in their response to such crimes – a step which was originally proposed by petitioners and other advocates who supported Ms. Lenahan’s case. In 2016, the Department of Justice established a $9.85 million grant program to implement the guidance nationwide. The petitioners further informed that the IACHR’s Merits Report and recommendations in the present case have also had an effect on the state and local levels. They indicated that, since 2011, over 30 municipalities have adopted resolutions and publications recognizing “freedom from domestic violence is a basic human right”, citing Jessica Lenahan’s case.[[21]](#footnote-21) The petitioners stated that, in 2017, the Illinois legislature passed the Illinois Sexual Violence Procedure Act (ISVPA), which addresses gender bias in law enforcement and medical responses to victims.
28. The Commission values the information presented by the petitioners in 2018 regarding measures adopted by the State which are aimed at restructuring the stereotypes of domestic violence victims and at promoting the eradication of discriminatory socio-cultural patterns that impede women and children’s full protection from acts of domestic violence. At the same time, the Commission notes that the State has not presented detailed and up-to-date information on actions taken to comply with this recommendation since 2012. Based on this, the Commission finds that Recommendations 6 has been partially complied with.
29. **With regard to the seventh recommendation**, in 2012, the State stressed that OVW had supported the development of a host of best practices materials related to the enforcement of protection orders.[[22]](#footnote-22)
30. The petitioners have not presented specific information about actions adopted by the State to comply with this recommendation.
31. The Commission notes the information previously presented by the State regarding actions adopted to design protocols at the federal and state levels specifying the proper components of the investigation by law enforcement officials of a report of missing children in the context of a report of a restraining order violation. However, the Commission notes that the State has not presented detailed and up-to-date information on actions taken to comply with this recommendation since 2012. Based on this, the Commission finds that Recommendations 7 has been partially complied with.
32. **Level of compliance of the case**
33. Based on the foregoing, the IACHR concludes that the compliance of the case is partial. Consequently, the Commission will continue to monitor compliance with Recommendations 1 to 7.
34. The IACHR urges the State to adopt the necessary measures to fully comply with the recommendations issued in Merits Report No. 80/11 and to provide it with detailed and up to date information about these actions.
35. **Individual and structural results of the case**
36. This section highlights the individual and structural results of the case which have been informed by the parties.
37. **Individual results of the case**

* No individual results have been informed by the parties.

1. **Structural impact of the case**

*Public policies*

* The adoption by over 30 municipalities of resolutions and publications which recognize “freedom from domestic violence is a basic human right”, citing Jessica Lenahan’s case, since 2011.
* Implementation by the Office on Violence against Women of the Family Court Demonstration Initiative (FCDI), the goal of which is to determine what family court procedures, practices, and structures related to custody and visitation can help keep victims of domestic violence and their children safe from further violence and trauma.

*Institutional strengthening*

* Use of STOP funds by states to place special victim assistants, known as “Jessica Gonzales Victim Assistants,” in local law enforcement agencies, in order to improve the enforcement of protection orders.
* Implementation of various training and technical assistance projects by the Office on Violence against Women aimed at increasing the enforcement of protection orders and improving the response to violence against women, including the National Center for Full Faith and Credit, Project Passport, the publication of the manual “Civil Protection Orders: A Guide for Improving Practice”, Blueprint for Safety Initiative, Lethality Assessment TA Project, Danger Assessment and Risk Management Training Project.
* Adoption of the Gender Discrimination Findings and Recommendations in New Orleans Police Department Consent Decree by the New Orleans Police Department.
* Provision of training by the Office on Violence against Women to Castle Rock Police Department during the spring of 2013.
* On June 20, 2013, the Office of Community Oriented Policing Services, the Office of Victims and Crime and the Office on Violence against Women of the Department of Justice issued a joint statement on gender discrimination in policing which stated that prevention of sex-based discrimination by law enforcement is a top priority of the Civil Rights Division of the U.S. Department of Justice given of the negative role gender bias plays in the law enforcement response to crimes against women.
* Office on Violence against Women supported the development of a host of best practices materials related to the enforcement of protection orders.
* The U.S. Department of Justice released, in 2015, official DOJ guidance to law enforcement agencies on how to prevent gender bias in their response to such crimes – *Identifying and Preventing Gender Bias in Law Enforcement Response to Sexual Assault and Domestic Violence*.
* In 2016, U.S. Department of Justice established a $9.85 million grant program to implement the *Identifying and Preventing Gender Bias in Law Enforcement Response to Sexual Assault and Domestic Violence* guidance nationwide.
* Implementation of a lethality assessment program in Douglas County, Colorado, in 2016, through which law enforcement officials evaluate the potential threat to potential victims of domestic level and, if necessary, subsequently adopt preventative measures to protect women from imminent acts of violence.

*Legislation/Regulations*

* U.S. Congress added a new statutory purpose area to the STOP Violence Against Women Formula Grant Program in the Violence against Women Act (VAWA) of 2005, allowing states to use STOP funds to place special victim assistants, known as “Jessica Gonzales Victim Assistants,” in local law enforcement agencies, in order to improve the enforcement of protection orders.
* Adoption by the Illinois legislature of the Illinois Sexual Violence Procedure Act (ISVPA) in 2017, which addresses gender bias in law enforcement and medical responses to victims.

1. IACHR, Press release No. 92/11 - [IACHR Publishes Report on Case Jessica Lenahan of the United States](http://www.oas.org/en/iachr/media_center/preleases/2011/092.asp). Washington, D.C., August 17, 2011. [↑](#footnote-ref-1)
2. IACHR, 153rd Period of Sessions, Hearing – [“Case 12.626 – Jessica Lenahan (Gonzales), United States (Follow-up on Recommendations)”](http://www.oas.org/es/cidh/multimedia/sesiones/153/default.asp), October 27, 2014; IACHR, Press release No. 131A/14 - [Report on the 153rd Session of the IACHR](http://www.oas.org/en/iachr/media_center/PReleases/2014/131A.asp). Washington, D.C., December 29, 2014. [↑](#footnote-ref-2)
3. IACHR, 2012 Annual Report, [Chapter III, Section D: Status of compliance with the recommendations of the IACHR](http://www.oas.org/en/iachr/docs/annual/2012/Chap.3.D.doc), para. 647. [↑](#footnote-ref-3)
4. IACHR, Press release No. 131A/14 - [Report on the 153rd Session of the IACHR](http://www.oas.org/en/iachr/media_center/PReleases/2014/131A.asp). Washington, D.C., December 29, 2014. [↑](#footnote-ref-4)
5. IACtHR. [Case Albán Cornejo and others. Vs. Ecuador, Decision of November 22, 2007](http://www.corteidh.or.cr/docs/casos/articulos/seriec_171_ing.pdf). Series C No. 171, para. 62. [↑](#footnote-ref-5)
6. IACHR, Press release No. 131A/14 - [Report on the 153rd Session of the IACHR](http://www.oas.org/en/iachr/media_center/PReleases/2014/131A.asp). Washington, D.C., December 29, 2014. [↑](#footnote-ref-6)
7. IACHR, 2012 Annual Report, [Chapter III, Section D: Status of compliance with the recommendations of the IACHR](http://www.oas.org/en/iachr/docs/annual/2012/Chap.3.D.doc), para. 647. [↑](#footnote-ref-7)
8. IACHR, 2013 Annual Report, [Chapter II, Section D: Status of compliance with the recommendations of the IACHR](http://www.oas.org/en/iachr/docs/annual/2013/docs-en/AnnualReport-Chap2-D.pdf), para. 1143. [↑](#footnote-ref-8)
9. IACHR, 2012 Annual Report, [Chapter III, Section D: Status of compliance with the recommendations of the IACHR](http://www.oas.org/en/iachr/docs/annual/2012/Chap.3.D.doc), para. 647. [↑](#footnote-ref-9)
10. IACHR, Press release No. 131A/14 - [Report on the 153rd Session of the IACHR](http://www.oas.org/en/iachr/media_center/PReleases/2014/131A.asp). Washington, D.C., December 29, 2014. [↑](#footnote-ref-10)
11. IACHR, 2012 Annual Report, [Chapter III, Section D: Status of compliance with the recommendations of the IACHR](http://www.oas.org/en/iachr/docs/annual/2012/Chap.3.D.doc), para. 647. [↑](#footnote-ref-11)
12. IACHR, 2013 Annual Report, [Chapter II, Section D: Status of compliance with the recommendations of the IACHR](http://www.oas.org/en/iachr/docs/annual/2013/docs-en/AnnualReport-Chap2-D.pdf), para. 1143. [↑](#footnote-ref-12)
13. IACtHR, [Case of La Cantuta Vs. Peru, Judgement of November 29, 2006](http://www.corteidh.or.cr/docs/casos/articulos/seriec_162_ing.pdf). Series C No. 162, paras. 199-200. [↑](#footnote-ref-13)
14. IACHR, [Principal Guidelines for a Comprehensive Reparations Policy](http://www.cidh.org/pdf%20files/Lineamientos%20Reparacion%20Administrativa%2014%20mar%202008%20ENG%20final.pdf), 19 February 2008, OEA/Ser/L/V/II.131, doc. 1, para. 1; UNGA, [Resolution 60/147 Basic Principles and Guidelines on the Right to a Remedy and Reparation for Victims of Gross Violations of International Human Rights Law and Serious Violations of International Humanitarian Law](http://legal.un.org/avl/pdf/ha/ga_60-147/ga_60-147_ph_e.pdf), 16 December 2005. A/RES/60/147. [↑](#footnote-ref-14)
15. IACtHR, [Case of La Cantuta Vs. Peru, Judgement of November 29, 2006](http://www.corteidh.or.cr/docs/casos/articulos/seriec_162_ing.pdf). Series C No. 162, para. 200. [↑](#footnote-ref-15)
16. IACHR, 2012 Annual Report, [Chapter III, Section D: Status of compliance with the recommendations of the IACHR](http://www.oas.org/en/iachr/docs/annual/2012/Chap.3.D.doc), para. 648. [↑](#footnote-ref-16)
17. John Aguilar, “[Douglas County pioneers new way to reduce fatalities from domestic violence](https://www.denverpost.com/2017/01/01/douglas-county-reduce-domestic-violence-fatalities/)”, The Denver Post (2017). [↑](#footnote-ref-17)
18. IACHR, 2012 Annual Report, [Chapter III, Section D: Status of compliance with the recommendations of the IACHR](http://www.oas.org/en/iachr/docs/annual/2012/Chap.3.D.doc), para. 649. [↑](#footnote-ref-18)
19. IACHR, 2012 Annual Report, [Chapter III, Section D: Status of compliance with the recommendations of the IACHR](http://www.oas.org/en/iachr/docs/annual/2012/Chap.3.D.doc), para. 649. [↑](#footnote-ref-19)
20. IACHR, 2013 Annual Report, [Chapter II, Section D: Status of compliance with the recommendations of the IACHR](http://www.oas.org/en/iachr/docs/annual/2013/docs-en/AnnualReport-Chap2-D.pdf), para. 1145. [↑](#footnote-ref-20)
21. Cornell Law School, [Freedom from Domestic Violence as a Fundamental Human Right Resolutions, Presidential Proclamations, and Other Statements of Principle](https://www.lawschool.cornell.edu/Clinical-Programs/global-gender-justice/DV-Resolutions.cfm). [↑](#footnote-ref-21)
22. IACHR, 2012 Annual Report, [Chapter III, Section D: Status of compliance with the recommendations of the IACHR](http://www.oas.org/en/iachr/docs/annual/2012/Chap.3.D.doc), para. 649. [↑](#footnote-ref-22)