

Barrios Family v. Venezuela

I. COMPLIANCE AND FOLLOW-UP ADDENDUM¹

September 2, 2015: The State failed to comply with its duty to investigate the victims' deaths as outlined and required by the November 24, 2011 Judgment.² The Court acknowledged the State's partial compliance, but also acknowledged that the State only investigated three of the seven victims' deaths.³ In response, the Court required the State to submit a compliance report by no later than December 11, 2015.⁴ The Court kept the compliance monitoring procedure open for the ordered reparations.⁵

February 23, 2016: The State did not comply with its duty to reimburse the Court's Victim Legal Assistance Fund.⁶ The Court ordered the State to pay \$3,232.16 as soon as possible.⁷ Additionally, the Court required the State to pay the Victim Legal Assistance Fund \$1,885.48 for expenses in conducting the compliance hearing, due within ninety days of receiving notice from the Court.⁸ The Court then required the State to submit a compliance report on this obligation within four months.⁹

November 22, 2016: The State failed to fulfill its duty to update and inform the Court of its compliance with the Judgment, and the State failed to comply with its duty to reimburse the Victim Legal Assistance Fund.¹⁰ The Court considered the State's inaction and lack of response as violating the very purposes of the American Convention on Human

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2. Barrios Family v. Venezuela, Monitoring Compliance with Judgment, Order of the Court, Inter-Am. Ct. H.R. "Resolves," ¶ 1 (Sept. 2, 2015).

3. *Id.* "Considering That," ¶ 21.

4. *Id.* "Resolves," ¶ 4.

5. *Id.* "Resolves," ¶ 2.

6. Barrios Family v. Venezuela, Monitoring Compliance with Judgment, Order of the Court, Inter-Am. Ct. H.R. "Considering That," ¶ 5 (Feb. 23, 2016).

7. *Id.* "Resolves," ¶ 2.

8. *Id.* "Considering That," ¶ 4.

9. *Id.* "Resolves," ¶ 3.

10. Barrios Family v. Venezuela, Monitoring Compliance with Judgment, Order of the Court, Inter-Am. Ct. H.R. "Considering That," ¶¶ 4-5 (Nov. 22, 2016).

Rights.¹¹ The Court kept the compliance monitoring procedure open for the ordered reparations.¹²

The Court required the State to fulfill its obligations and comply with the Judgment as soon as possible.¹³ In accordance with this, the Court ordered the State to submit a compliance report no later than March 17, 2017.¹⁴

November 21, 2018: The State fully complied with its obligation to reimburse the Victim Legal Assistance Fund for \$3,232.16.¹⁵ The State partially complied with its obligation to reimburse the Victim Legal Assistance Fund for \$1,885.48, with a remaining balance of \$559.15.¹⁶

11. *Id.* “Considering That,” ¶ 6.

12. *Id.* “Resolves,” ¶ 5.

13. *Id.* “Resolves,” ¶ 6.

14. *Id.* “Resolves,” ¶ 7.

15. Barrios et al., Reimbursement of the Victims Legal Assistance Fund, Order of the Court, Inter-Am. Ct. H.R. “Considering That,” ¶¶ 5-6 (Nov. 21, 2018).

16. *Id.* “Considering That,” ¶ 7.