

Yvon Neptune v. Haiti

I. COMPLIANCE AND FOLLOW-UP¹

November 20, 2015: Seven years after issuing its Judgment, the Court expressed concern in its Monitoring Compliance at the State's evident contempt towards the mandatory nature of the proceedings.² The State did not submit a compliance report to the Court and missed the deadline by over six years.³ Moreover, the State filed briefs and letters in which it questioned the Court's Judgment and complained that the Court was "unfair."⁴ The Court found it unacceptable that the State continued to debate the nature of the proceedings⁵ and held that the State failed to comply with all of the reparations required by the Judgment.⁶

The Court made the following resolutions: (1) keep the compliance and monitoring process open for the foreseeable future; (2) order the State to comply with the reparations as soon as possible; (3) inform the General Assembly of the Organization of American States about the State's noncompliance; and (4) notify the State, the representatives of the victims, and the Inter-American Commission on Human Rights of the present resolutions.⁷

1. John Flynn, Author; Michelle Gonzalez, Editor, Erin Gonzalez, Chief IACHR Editor; Cesare Romano, Faculty Advisor.

2. Yvon Neptune v. Haiti, Monitoring Compliance with Judgment, Order of the Court, Inter-Am. Ct. H.R. "Considering that" ¶ 1, 7. (Nov. 20, 2015).

3. *Id.* ¶ 1.

4. *Id.* ¶¶ 4-5.

5. *Id.* ¶ 6.

6. *Id.* "Declares" ¶ 2.

7. *Id.* "Resolves" ¶¶ 3-6.