

Mejía Idrovo v. Ecuador

ABSTRACT¹

This case is about the denial of a promotion to Brigadier General of a Colonel of the Ecuadorian Army, and the subsequent failure by the State to allow him recourse before a competent court.

I. FACTS

A. Chronology of Events

December 21, 1972: The Ecuadorian Army commissions Mr. José Mejía Idrovo as a Second Lieutenant.²

2000: Mr. Mejía Idrovo presents himself before the Council of General Officers of the Land Forces so the Council may consider promoting him to the next rank—Brigadier General.³

December 2000: The Council of Generals sends a letter to Mr. Mejía Idrovo, without a date or reference number.⁴ The letter informs Mr. Mejía Idrovo that he is an honorable man of truth, honesty, and loyalty, but denies his request for a promotion to Brigadier General.⁵

December 15, 2000: Mr. Mejía Idrovo requests that the Commanding General of the Land Forces and the Chairman of the Council of Generals of the Land Forces of the State provide an explanation as to why his promotion was denied and reconsider his promotion.⁶

December 26, 2000: The Council of the Land Forces of the State in-

1. Karen Cody, Author; Diane Chang, Editor; Megan Venanzi, Chief IACHR Editor; Cesare Romano, Faculty Advisor.

2. Mejía Idrovo. v. Ecuador, Petition to the Court, Inter-Am. Comm'n H.R., Case No. 12.530, ¶ 31 (Nov 19, 2009).

3. *Id.*

4. *Id.* ¶ 32.

5. *Id.*

6. Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs, Judgment, Inter-Am. Ct. H.R. (ser. C) No. 228, ¶ 45 (July 5, 2011).

forms Mr. Mejía Idrovo that the Council upheld its original decision: a promotion to Brigadier General would be unfavorable.⁷ The Council provides no justification for their refusal to promote him.⁸

January 30, 2001: The President of the State issues Executive Decree No. 1185, stating that Mr. Mejía Idrovo is suspended for unspecified reasons from the Land Forces as of January 15, 2001.⁹

July 18, 2001: At the request of the Minister of Defense, the President of the State issues Executive Decree No. 1680.¹⁰ This decree calls for the discharge of Mr. Mejía Idrovo under Article 76(j) of the Military Service Code.¹¹

June 28, 2001: The Second Chamber of the Contentious-Administrative Court (“Second Chamber”) recognizes Mr. Mejía Idrovo’s appeal for legal protection in which he argues that Executive Decrees 1185 and 1680 should be revoked.¹² The Second Chamber finds Mr. Mejía Idrovo’s appeal for legal protection inadmissible due to an incomplete petition.¹³

July 9, 2001: Mr. Mejía Idrovo appeals the ruling of the Second Chamber of the Contentious-Administrative Court before the Constitutional Tribunal.¹⁴

October 4, 2001: Mr. Mejía Idrovo files an application for unconstitutionality with the Constitutional Court, asking the Court to find Executive Decrees 1185 and 1680 unconstitutional.¹⁵ Mr. Mejía Idrovo also asks the Court to order his reinstatement to the armed forces and his promotion to Brigadier General with full honors, pay, and statutory rights.¹⁶ The Office of the Ombudsman supports Mr. Mejía Idrovo in filing his application with the Constitutional Court.¹⁷

7. *Id.*

8. *Id.*

9. Mejía Idrovo v. Ecuador, Petition to the Court, ¶ 34.

10. *Id.*

11. *Id.*

12. Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs, ¶ 47.

13. *Id.*

14. *Id.*

15. Mejía Idrovo v. Ecuador, Petition to the Court, ¶ 35.

16. *Id.*

17. *Id.*

October 19, 2001: The Court confirms the dismissal of Mr. Mejía Idrovo's appeal for legal protection, stating that he did not comply with the proper legal process for the suspension of Executive Decrees.¹⁸

March 12, 2002: The Criminal Chamber of the Constitutional Court accepts Mr. Mejía Idrovo's application, rules that the Executive Decrees were fundamentally unconstitutional, and orders reparations in Mr. Mejía Idrovo's favor for the harm caused.¹⁹

April 4, 2002: The Official Registrar publishes the decision of the Criminal Chamber of the Constitutional Court in Mr. Mejía Idrovo's case, making the decision enforceable from the date of the Court's decree.²⁰

April 8, 2002: Mr. Mejía Idrovo submits briefs to the President of the Constitutional Court and the Plenary of the Constitutional Tribunal, demanding that they comply with the March 12, 2002, decision of the Constitutional Court.²¹

May 30, 2002: The President of the Constitutional Court issues a resolution stating that the decision of the Constitutional Court became effective upon its April 4, 2002, publication.²² The President of the Constitutional Court clarifies that the decision of the Court voided the acts that were declared unconstitutional, but does not have a retroactive effect.²³ Thus, the President of the Constitutional Court grants Mr. Mejía Idrovo reparations for the harm he sustained, but not reinstatement to the armed forces.²⁴

June 5, 2002: Mr. Mejía Idrovo submits a series of complaint briefs to the President and the Plenary of the Constitutional Court.²⁵ In the briefs, Mr. Mejía Idrovo demands withdrawal of the May 30, 2002, resolution *inter alia* because it was not within the President's authority and because Mr. Mejía Idrovo had not been properly notified.²⁶

18. Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs, ¶ 47.

19. Mejía Idrovo v. Ecuador, Petition to the Court, ¶ 36.

20. *Id.* ¶ 38.

21. Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs, ¶ 54.

22. Mejía Idrovo v. Ecuador, Petition to the Court, ¶ 41.

23. *Id.*

24. *Id.*

25. *Id.* ¶ 42.

26. *Id.*

July 12, 2002: The Constitutional Court writes to the President of the Republic, the Head of Joint Chiefs of Staff of the Armed Forces, the Minister of Defense, and the Prosecutor General to request information on compliance with the ruling adopted *en banc* by the Constitutional Court.²⁷

July 17, 2002: The Office of the Prosecutor General responds to the Constitutional Court's request, stating that, since the President made the Executive Decrees that were deemed unconstitutional, it was up to him to comply with the Constitutional Court's decision.²⁸

July 31, 2002: The Ministry of Defense replies to the Constitutional Court's request by confirming that they have ordered the General Command of the Land Forces to comply with the May 30, 2002, decision of the Constitutional Court.²⁹

August 7, 2002: Mr. Mejía Idrovo writes to the President of the State, requesting compliance with the Plenary of the Constitutional Court's ruling.³⁰

August 14, 2002: The Joint Chiefs of Staff of the Armed Forces ("Joint Chiefs of Staff") respond to the Constitutional Court's inquiry, saying that Mr. Mejía Idrovo cannot be reinstated due to the non-retroactivity of the decision.³¹ The Joint Chiefs of Staff verifies that remunerations have been paid to Mr. Mejía Idrovo up to July 2001, but due to Mr. Mejía Idrovo's failure to provide the necessary documents to the Armed Forces Social Security Institute, he could only get the remunerations that accrued up to July of 2002 by completing the appropriate application.³²

August 28, 2002 and September 6, 2002: Mr. Mejía Idrovo writes to the Constitutional Court alleging a violation of the Ecuadorian Constitutional standards and an infringement of Article 25(2)(c) of the Convention due to non-compliance.³³

October 24, 2002: A petition is submitted on behalf of Mr. Mejía Idro-

27. Mejía Idrovo v. Ecuador, Petition to the Court, ¶ 43.

28. *Id.* ¶ 44.

29. *Id.* ¶ 45.

30. *Id.* ¶ 49.

31. *Id.* ¶ 46.

32. Mejía Idrovo v. Ecuador, Petition to the Court, ¶ 47.

33. *Id.* ¶ 50.

vo to the Inter-American Commission (“the Commission”).³⁴

January 20, 2003: Mr. Mejía Idrovo writes to the President of the State, requesting observance of the Constitutional Court’s decision on March 12, 2002.³⁵

March 10, 2003: Mr. Mejía Idrovo writes to the Office of the President of the State again, requesting that decrees be drafted ordering his reinstatement in the Armed Forces and a rank promotion to Brigadier General in compliance with the decision of the Constitutional Court.³⁶

March 18, 2003: The Office of the President of the State responds to Mr. Mejía Idrovo’s writings by referring him to the ISSFA: the Armed Forces Social Security Institute.³⁷ The Office of the President reiterates the Joint Chief of Staffs’ explanation that Mr. Mejía Idrovo is not entitled to reinstatement, only remunerations, and that he must follow the statutory procedures of the ISSFA to collect his benefits and service pay.³⁸

June 17, 2003: The Office of the President of the State writes to Mr. Mejía Idrovo, informing him that according to the Minister of Defense, the Personnel Department of the Land Forces and the ISSFA were ready to meet his requests for severance and retirement if he approached both entities to carry out the relevant statutory procedures.³⁹

July 10, 2003: The Office of the President of the State informs Mr. Mejía Idrovo that he is entitled to an initial pension of \$766.29 and \$62,196.91 of officer’s severance pay, but that there would be deductions from the sum of his severance pay in unknown amounts.⁴⁰

December 17, 2003: The Office of the President of the State writes to Mr. Mejía Idrovo confirming that the decision of the Constitutional Court does not have a retroactive effect and he would not be reinstated in the Armed Forces.⁴¹ The Office of the President of the State further advised that it would be futile to seek a new opinion and otherwise at-

34. Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs, ¶ 1.

35. Mejía Idrovo v. Ecuador, Petition to the Court, ¶ 52.

36. *Id.*

37. *Id.* ¶ 53.

38. *Id.*

39. Mejía Idrovo v. Ecuador, Petition to the Court, ¶ 57.

40. *Id.* ¶ 58.

41. *Id.* ¶ 59.

tempt to get rights that the Constitutional Court did not already provide him.⁴²

B. Other Relevant Facts

[None]

II. PROCEDURAL HISTORY

A. Before the Commission

October 24, 2002: The Ecumenical Commission on Human Rights submits Petition No. 12.530 before the Commission on behalf of Mr. Mejía Idrovo.⁴³

March 17, 2009: The Commission adopts the Admissibility and Merits Report No. 07/09, in which it declares that the case is admissible and recommends that the State adopt the appropriate measures to ensure compliance with the March 12, 2002 action of unconstitutionality issued by the Constitutional Tribunal of the State, as well as reparations for Mr. Mejía Idrovo.⁴⁴ The Constitutional Tribunal found that the State violated Mr. Mejía Idrovo's guarantee of equal protection under the law; Mr. Mejía Idrovo was denied a promotion whereas his fellow superior officers were promoted based on meeting the same qualifications under the Military Service Code.⁴⁵

B. Before the Court

November 19, 2009: The Commission submits the case to the Court after the State failed to adopt its recommendations.⁴⁶

1. Violations Alleged by the Commission⁴⁷

Article 8(1) (Right to a Hearing Within Reasonable Time by a Competent and Independent Tribunal)
Article 25 (Right to Judicial Protection)

42. Mejía Idrovo v. Ecuador, Petition to the Court, ¶ 59.

43. Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs, ¶ 1; Mejía Idrovo v. Ecuador, Petition to the Court, ¶ 59.

44. *Id.*

45. *Id.* ¶ 120.

46. *Id.* ¶ 1.

47. *Id.* ¶ 3.

all in relation to:

Article 1(1) (Obligation of Non-Discrimination) of the American Convention.

2. Violations Alleged by Representatives of the Victim⁴⁸

Same Violations Alleged by Commission, plus:

Article 2 (Domestic Legal Effects)

Article 17 (Rights of the Family)

Article 24 (Right to Equal Protection)

all in relation to:

Article 1(1) (Obligation of Non-Discrimination) of the American Convention.

June 24, 2010: The State presents its brief with preliminary objections, an answer to the application, and observations to the brief of pleadings and motions.⁴⁹

August 19, 2010: The Commission presents written arguments to the State's brief containing the preliminary objections; the Commission requests the Court dismiss the State's preliminary objections and continue with the merits of the case.⁵⁰

June 20, 2011: The State provides information about the new qualification procedures for Mr. Mejía Idrovo.⁵¹

III. MERITS

A. Composition of the Court⁵²

Diego García-Sayán, President

Leonardo A. Franco, Judge Vice President

48. Mejía Idrovo v. Ecuador, Petition to the Court, ¶ 20. The Ecumenical Commission on Human Rights serves as representative of Mr. Mejía Idrovo. Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs, ¶ 1.

49. Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs, ¶ 5.

50. *Id.* ¶ 6.

51. *Id.* ¶ 12.

52. Judge Alberto Pérez Pérez did not participate in the case deliberation for reasons of *force majeure*. Emilia Segares Rodríguez, the Deputy Secretary, also informed the court that she would not be present for the deliberation in this case for reasons of *force majeure*. *Id.* n.*.

Manuel E. Ventura Robles, Judge
Margarette May Macaulay, Judge
Rhadys Abreu Blondet, Judge
Alberto Pérez Pérez, Judge
Eduardo Vio Grossi, Judge

Pablo Saavedra Alessandri, Secretary

B. Decision on the Merits

July 5, 2011: The Court issues its Judgment on Preliminary Objections, Merits, Reparations, and Costs.⁵³

The Court rejected the State's preliminary objections.⁵⁴

The Court found the first preliminary objection, that the Court lacked jurisdiction to analyze Mr. Mejía Idrovo's claim, inadmissible.⁵⁵ The State based its preliminary objection on its claim that, in order to resolve the petition of Mr. Mejía Idrovo, the Court would need to analyze and interpret issues of domestic law and fact.⁵⁶ The Court found that it must determine if, at the domestic level, the State breached international obligations developed from Inter-American mechanisms that grant the Court jurisdiction.⁵⁷ In reference to the second preliminary objection, the non-exhaustion of domestic remedies, the Court found that the few domestic remedies still available were not the most appropriate proceedings to provide the solution Mr. Mejía Idrovo sought.⁵⁸

The Court found unanimously that the State violated:

Article 25(1) (Right to Recourse Before a Competent Court), in relation to Article 1(1) of the Convention, to the detriment of Mr. Mejía Idrovo,⁵⁹ because:

The State failed to provide an effective remedy for Mr. Mejía Idrovo.⁶⁰

53. Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs, ¶ 1.

54. *Id.* ¶ "Decides" ¶ 1.

55. *Id.* ¶¶ 20-23.

56. *Id.* ¶ 15.

57. *Id.* ¶ 20.

58. *Id.* ¶ 32.

59. Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs, "Declares" ¶ 2.

60. *Id.* ¶ 98.

Specifically, the unconstitutionality action Mr. Mejía Idrovo brought to the Constitutional Court of Ecuador was suitable to protect Mr. Mejía Idrovo's legal interests, but did not repair the situation and did not produce the result that it was intended create.⁶¹ Mr. Mejía Idrovo brought his claim of unconstitutionality to the Constitutional Court of Ecuador because this was his only option under Article 276 of the Ecuador's Constitution.⁶² The Court found that the Constitutional Court's decision based on the unconstitutionality action was ineffective because the scope of the order was unclear.⁶³

The Court reasoned that the unconstitutionality action did not provide judicial protection as required under Article 25(1) (Right to Recourse Before a Competent Court) because the Court's ruling merely ordered repair of the harm done to Mr. Mejía Idrovo.⁶⁴ Upon hearing the unconstitutionality action and rendering a decision, the Court lacked precision and clarity in defining the scope of the reparations and how to implement them.⁶⁵ The Resolution of the President of the Tribunal of May 30, 2002 further contributed to the confusion about the scope of the decision.⁶⁶ Therefore, the Court determined that the State violated Article 25(1) (Right to Recourse Before a Competent Court) of the Convention.⁶⁷

Article 25(2)(c) (Remedies Must Be Enforced), in relation to Article 1(1) of the Convention, to the detriment of Mr. Mejía Idrovo,⁶⁸ because:

The State did not guarantee the implementation of domestic rulings.⁶⁹ Mr. Mejía Idrovo received a judgment from the Constitutional Tribunal pertaining to his unconstitutionality action on March 12, 2002.⁷⁰ The State did not comply with the judgment until 2008, when the new Constitution of Ecuador, incorporating a noncompliance action, was implemented.⁷¹ Subsequent to the issuance of the new constitution, Mr.

61. *Id.*

62. *Id.* ¶ 92.

63. *Id.* ¶ 98.

64. *Id.* ¶ 97.

65. Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs, ¶ 97.

66. *Id.*

67. *Id.* ¶ 98.

68. *Id.* "Declares" ¶ 2.

69. *Id.* ¶ 112.

70. *Id.* ¶ 107.

71. Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs, ¶ 107.

Mejía Idrovo filed a new remedy with the Constitutional Court in 2009 under the noncompliance mechanism outlined in the document.⁷² The Constitutional Court ruled in Mr. Mejía Idrovo's favor, but the State did not fully comply with points laid out in the judgment.⁷³ The Court determined that the State did not comply with an effective judicial protection to carry out its domestic rulings for an extended period of time, and thus violated Article 25(2)(c) (Remedies Must Be Enforced).⁷⁴

The Court did not rule on:

Article 8(1) (Right to a Hearing Within Reasonable Time by a Competent and Independent Tribunal), in relation to Article 1(1) of the Convention,⁷⁵ because:

The Constitutional Tribunal ruled on this topic and, therefore, the State acknowledged and rectified the violation in the domestic jurisdiction.⁷⁶

Article 24 (Right to Equal Protection), in relation to Article 1(1) of the Convention,⁷⁷ because:

There was not adequate evidence for a proper analysis of a violation to Article 24 (Right to Equal Protection).⁷⁸

The Court unanimously dismissed the claim of Article 2 (Obligation to Give Domestic Legal Effect to Rights), in relation to Article 1(1) of the Convention,⁷⁹ to the detriment of Mr. Mejía Idrovo, because the Court substantively ruled on the failure to carry out the judgment in a corresponding section, and for a lack of evidence.⁸⁰

C. Dissenting and Concurring Opinions

[None]

72. *Id.*

73. *Id.*

74. *Id.* ¶ 111.

75. *Id.* "Declares" ¶ 1.

76. *Id.* ¶ 64.

77. *Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs, "Declares" ¶ 4.*

78. *Id.* ¶ 122.

79. *Id.* "Declares" ¶ 3.

80. *Id.* ¶ 115.

IV. REPARATIONS

The Court ruled unanimously that the State had the following obligations:

A. Specific Performance (Measures of Satisfaction and Non-Repetition Guarantee)

1. Judgment as a Form of Reparation

The Court indicated that the Judgment itself is a form of *per se* reparation.⁸¹

2. Publish the Judgment

The State must publish the established facts and operative paragraphs of the Court's Judgment in the Official Gazette and in a nationally circulated newspaper.⁸²

3. Issue a Public Apology

The State must publicly apologize to Mr. Mejía Idrovo and his family for the harm and contempt that they suffered throughout the ordeal.⁸³ This apology is to take place at a public military celebration of redress for Mr. Mejía Idrovo.⁸⁴

B. Compensation

The Court awarded the following amounts:

1. Pecuniary Damages

The Court ordered the State to pay \$220,895.81 in pecuniary damages.⁸⁵ This is to compensate Mr. Mejía Idrovo for loss of income, the costs associated with motive in the facts, and pecuniary consequences stemming from the facts of the case.⁸⁶

81. *Id.* "And Orders" ¶ 172(1).

82. *Id.* ¶ 139.

83. *Mejía Idrovo v. Ecuador*, Preliminary Objections, Merits, Reparations and Costs, ¶ 139.

84. *Id.*

85. *Id.* ¶ 156.

86. *Id.* ¶ 150.

2. Non-Pecuniary Damages

The Court ordered the State to pay a total of \$163,137.78 in non-pecuniary damages for the suffering and distress of Mr. Mejía Idrovo and his family.⁸⁷

3. Costs and Expenses

The Court ordered the State to pay Mr. Mejía Idrovo \$15,000.00 for the costs and expenses sustained during the proceedings of the Court.⁸⁸ Mr. Mejía Idrovo is to pay the corresponding amount to the persons or organizations that have undertaken his representation.⁸⁹

4. Total Compensation (including Costs and Expenses ordered):

\$399,033.59

C. Deadlines

The State must publish a summary of the Judgment in the Official Gazette and in a nationally circulated newspaper within six months.⁹⁰

The official websites should make the entire judgment available for one year.⁹¹

The State must pay Mr. Mejía Idrovo the amount awarded by the Court for pecuniary and non-pecuniary damages within one year of the Judgment.⁹² The State must also reimburse Mr. Mejía Idrovo for costs and expenses within one year of the Judgment.⁹³

The State must submit a report to the Court on the measures adopted in order to comply with the Judgment within one year.⁹⁴

V. INTERPRETATION AND REVISION OF JUDGMENT

[None]

87. *Id.* ¶¶ 150, 156.

88. *Id.* ¶ 163.

89. *Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs*, ¶ 163.

90. *Id.* ¶ 141.

91. *Id.*

92. *Id.* ¶ 156.

93. *Id.* ¶ 165.

94. *Id.* “And Orders” ¶ 172 (4).

VI. COMPLIANCE AND FOLLOW-UP

June 26, 2012: The Court found that the State complied with its obligation to publish a summary of the Judgment and to offer the Judgment on official websites within their allotted time.⁹⁵ The State published the official summary of the Judgment in “*El Comercio*” newspaper on January 1, 2012, and made the full Judgment available on the websites of the Ministry National of Defense and the Ministry of Justice, Human Rights, and Religion for one year.⁹⁶ The Court continued to monitor the compliance of the State in paying Mr. Mejía Idrovo pecuniary damages, non-pecuniary damages, costs, and expenses.⁹⁷

September 4, 2012: The Court found that the State complied with its obligations to pay Mr. Mejía Idrovo \$399,033.59 for pecuniary damages, non-pecuniary damages, costs, and expenses.⁹⁸ The Court further found that the State fully complied with all of its obligations and closed the case.⁹⁹

VII. LIST OF DOCUMENTS

A. Inter-American Court

1. Preliminary Objections

[None]

2. Decisions on Merits, Reparations, and Costs

[Mejía Idrovo v. Ecuador, Preliminary Objections, Merits, Reparations and Costs, Judgment, Inter-Am. Ct. H.R. \(ser. C\) No. 228 \(July 5, 2011\).](#)

3. Provisional Measures

[Mejía Idrovo v. Ecuador, Order of the President of the Court, Inter-Am. Ct. H.R. \(ser. E\) \(December 2, 2010\) \(Available only in Spanish\).](#)

95. *Mejía Idrovo v. Ecuador, Monitoring Compliance with Judgment, Order of the Court, Inter-Am. Ct. H.R. “Considering That” ¶ 7.*

96. *Id.* “Considering That” ¶ 5.

97. *Id.* “Declares That” ¶ 2.

98. *Mejía Idrovo v. Ecuador, Monitoring Compliance with Judgment, Order of the Court, Inter-Am. Ct. H.R. “Obligación de pagar” ¶ 8 (Available only in Spanish).*

99. *Id.* “Y Resuelve” ¶ 1–2.

4. Compliance Monitoring

[Mejia Idrovo v. Ecuador, Monitoring Compliance with Judgment, Order of the Court, Inter-Am. Ct. H.R. \(June 26, 2012\).](#)

[Mejia Idrovo v. Ecuador, Monitoring Compliance with Judgment, Order of the Court, Inter-Am. Ct. H.R. \(September 4, 2012\) \(Available only in Spanish\).](#)

5. Review and Interpretation of Judgment

[None]

B. Inter-American Commission

1. Petition to the Commission

[Not Available]

2. Report of Admissibility

[Not Available]

3. Provisional Measures

[None]

4. Report on Merits

[Not available]

5. Application to the Court

[Mejia Idrovo. v. Ecuador, Petition to the Court, Inter-Am. Comm'n H.R., Case No. 12.530 \(Nov 19, 2009\).](#)

VIII. BIBLIOGRAPHY

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[Luis I. Jacome H., The Late 1990s Financial Crisis in Ecuador: Institutional Weaknesses, Fiscal Rigidities, and Financial Dollarization at Work, International Monetary Fund \(January 2004\), https://www.imf.org/external/pubs/ft/wp/2004/wp0412.pdf.](https://www.imf.org/external/pubs/ft/wp/2004/wp0412.pdf)