

Background- Brazil¹

Brazil is the largest country in South America by both size and population (est. 200 million, 2016). For much of its history, it struggled with government repression and corruption. In the 1960s and 1970s, Brazil's military dictatorship arrested and disappeared leftists. Although Brazil returned to democracy in the 1980s, it has failed to prosecute the human rights violations committed by the dictatorship and murders and police harassment of human rights, worker's rights, and environmentalist activists remain common. Additionally, Brazil's activists, prosecutors, and judges are in the midst of a battle to uproot long-standing corruption, leading to the fall of two presidents in recent years and many other high-level political figures.

Uniquely in Latin America, Brazil is a former Portuguese colony that achieved independence under the continued leadership of Portugal's monarchy. After Christopher Columbus' first journey to Latin America in 1492, Spain sought to establish exclusive rights to the Americas against other European powers, and especially against Portugal's entrepreneurial naval explorers. After mediation by the Pope, Spain and Portugal negotiated an agreement (*Treaty of Tordesillas*) giving Spain rights to all lands west of 46° 30' W and Portugal rights to all lands to the east. In 1500, Portuguese explorers reached Brazil, then inhabited by two to six million hunter-gatherers, fishers, and farmers. The Portuguese king granted large tracts of Brazilian land to favored courtiers, known as donatários, who established sugar plantations worked by both indigenous and African slaves. As time went on, the Portuguese pushed farther into the interior, well past the originally agreed upon boundary with Spain. Ranchers sought new land for their cattle. Bandeirantes (explorers) searched for precious metals to mine and indigenous peoples to enslave. Jesuits also searched for indigenous peoples, who they converted, resettled on aldeias (missions), and armed against the bandeirantes. In 1659, the bandeirantes found first gold and then diamonds, prompting a gold rush into the interior. As Brazil expanded, it grew increasingly frustrated with Portugal, which failed to prevent repeated French and Dutch incursions on Brazilian territory and was itself temporarily absorbed by Spain. In the early 1800s, Napoleon conquered both Spain and Portugal, which most of Spanish Latin America used as a pretext to declare independence, ostensibly in support of the Spanish monarchy. However, the Portuguese prince regent, Dom João, forestalled this possibility by fleeing to Brazil, establishing his government in Rio de Janeiro, and implementing reforms benefiting Brazilians, including allowing Brazilians to begin manufacturing their own goods instead of importing them from Portugal, allowing Brazilians to trade with countries other than Portugal, and declaring Brazil coequal with Portugal. After Napoleon was defeated and Dom João inherited the throne, he returned to Portugal but left his own son, Dom Pedro, as the new prince regent. The Portuguese parliament demanded the repeal of the reforms benefiting Brazil and the return of Dom Pedro to Portugal. Dom Pedro refused, announcing "Fico" ("I am staying"), and declaring himself emperor of the newly independent Brazil in 1822.

Following independence, Brazil gradually transitioned from an economy based on sugar plantations farmed by slaves to an economy based on coffee plantations farmed by free, but often

¹ Caitlin Hunter, *Author, Foreign and International Law Librarian at Loyola Law School*; Erin Gonzalez, *Chief IACHR Editor*; Cesare Romano, *Faculty Advisor*

exploited, workers. Pedro squandered his initial popularity by violently putting down revolts, dissolving the legislature, exiling opponents, and failing to prevent a southern province from achieving independence as the new nation of Uruguay. He also angered sugar plantation owners by agreeing to phase out the importation of slaves. In 1831, he abdicated in favor of his 5 year old son, Pedro II, prompting a rebellious, chaotic regency that ended with Pedro II's ascent as emperor at just 14. Despite these difficult circumstances, Pedro II established a reputation as intelligent, kind, and humble. In 1870, Brazil joined the War of the Triple Alliance, which began after Paraguay's dictator unwisely declared war on Brazil, Uruguay, and Argentina simultaneously. The war devastated Paraguay and distracted Brazil's army from recapturing escaped slaves. By the 1870s, the number of free Afro-Brazilians outstripped the number of slaves. In 1874, Pedro II declared that henceforth all children born to slaves would be free and, in 1888, the princess regent declared the freedom of Brazil's 700,000 remaining slaves. Brazil's economy shifted from the northeastern sugar plantations to the southeastern coffee plantations. In 1889, the military forced Pedro II into exile, paving the way for a democracy run by a series of "coffee presidents." These presidents successfully expanded Brazil's territory and economy, encouraging immigration and urbanization. However, they also protected the interests of the coffee farmers over ordinary workers and were elected by a highly restricted pool of eligible voters amidst widespread voter fraud.

In the early 1900s, resentment over the government's corruption and the mistreatment of workers led to the instatement of new governments that promised better treatment for workers but struggled to control corruption and the economy. Throughout the 1920s, junior army officers known as tenentes ("lieutenants") staged uprisings in favor of stronger central government, nationalization of natural resources, and greater protections for workers. In 1930, the government was finally overthrown by Getúlio Vargas, a civilian politician who had lost that year's presidential election. Although dictatorial, Vargas implemented popularly demanded protections for workers, greater centralization, and universal suffrage. He also expanded industrialization, increased education, and nationalized the petroleum industry under Petrobrás. Although the military forced Vargas from power in 1945, the popularity of his programs allowed him to return to power as Brazil's democratically elected president in 1950. However, Vargas struggled to govern without dictatorial powers and, in the early 1950s, inflation spiraled and corruption flourished. In 1954, Vargas was implicated in a plot to assassinate his political opponents and killed himself rather than resign. Vargas' death engendered sympathy and helped ensure the presidential win of his protégé, Juscelino Kubitschek De Oliveira. Kubitschek expanded petroleum production and engaged in extensive infrastructure projects, building highways, hydroelectric projects, and the new capital: Brasília. Although these projects helped modernize Brazil, they also generated enormous expense, made worse by unchecked corruption. Brazil's foreign debt doubled and the cost of living tripled and, in 1960, voters elected Jânio Quadros, a longtime opponent of Vargas and Kubitschek. However, Quadros resigned after only 7 months in power, citing "terrible forces" working against him, and leaving the presidency to Kubitschek's former vice president, João Goulart. Armed conflict almost broke out over whether to allow Goulart to assume office. After a tense week, the legislature and the military agreed that Goulart could assume the presidency on the condition that Brazil shifted to a parliamentary system in which real power was held by the prime minister. Goulart accepted the presidency, then persuaded the public to vote to restore his presidential powers. Embroiled in power struggles, Goulart and the legislature could not govern effectively and allowed inflation to triple the cost of

living and decrease the currency to a tenth of its former value. Positions on both sides hardened, with Goulart moving farther left and his political opponents and the military moving farther to the right.

In 1964, the political conflict culminated in the institution of a military dictatorship. In March of 1964, Goulart instituted agrarian reform, nationalized private oil refineries, and refused to suppress a military strike. The military leadership and conservative politicians rebelled, forced Goulart into exile, and instituted a dictatorship that cracked down on leftists. The government passed a series of institutional acts and constitutional reforms that allowed the military to remove elected officials, exile and abrogate the political rights of “subversives,” and try civilians in military courts. Soon, the government abrogated the rights of hundreds and arrested thousands. When the military’s chosen president refused to annul local elections won by the opposition, the military leadership threatened to remove him, then banned all parties except for their own artificially created government party, the National Renewal Alliance (Aliança Renovadora Nacional; ARENA), and an artificially created opposition party, the Brazilian Democratic Movement (Movimento Democrático Brasileiro; MDB). The ARENA candidate was elected unopposed after the opposition refused to participate in the farce by nominating their own candidate. Antigovernment demonstrators protested and the Communist Party of Brazil went further, creating the Araguaia Guerrilla Movement (“Guerrilha do Araguaia.”) In response, the government issued 1968’s Fifth Institutional Act, dissolving Congress and authorizing further crackdowns on opponents. From 1972 to 1975, the state disappeared over sixty members and suspected members of the guerilla movement and arrested and tortured many more.² Despite these human rights violations, protests were muted by the success of the economy, which grew rapidly as the government reduced inflation and invested heavily in hydroelectric projects, transportation, and industry.

Over time, the military gradually released its grip on the government and allowed Brazil to return to democracy. In 1974, the government restored the political rights of members of the opposition, including Kubitschek, Quadros, and Goulart, and the MDB began to win an increasing number of elections. ARENA candidate General Ernesto Geisel won the presidency but his attitude towards the military dictatorship was ambivalent. He dismissed Congress again in 1977 and handpicked another general as his successor but also repealed the acts suppressing political dissent, including the Fifth Institutional Act. In 1979, Congress passed an amnesty law that prohibited any investigation or prosecution of human rights violations committed during the dictatorship,³ but also fully restored the opposition’s political rights. In 1985, José Sarney of the newly legal Democratic Alliance took office as Brazil’s first civilian president in 21 years.

Brazil emerged from dictatorship as a modern, industrialized democracy but continued to struggle with its economy. The dictatorship’s economic projects had allowed Brazil to achieve the world’s tenth highest GDP but had also left it with some of the world’s highest foreign debt and inflation. Additionally, most of the economic improvements had benefited a small elite, leaving the majority of Brazilians impoverished. Both Sarney and his successor, Fernando Collor

² Gomes Lund et al. (“Guerrilha do Araguaia”) v. Brazil, Preliminary Objections, Merits, Reparations, and Costs, Judgment, Inter-Am. Ct. H.R. (ser. C) No. 219 (Nov. 24, 2010), <https://iachr.lls.edu/cases/gomes-lund-et-al-guerrilha-do-araguaia-v-brazil>.

³ *Id.*

de Mello, failed to control inflation and Collor was impeached for corruption after only two years. Collor's vice president assumed leadership of a country facing falling production, falling income, massive interest payments on its foreign debts, and an annual inflation rate of nearly 2,700 percent. The new president assigned responsibility for fixing the economy to finance minister Fernando Henrique Cardoso. Cardoso's Real Plan brought inflation under control without significantly damaging growth and swept him to the presidency in 1995. However, in the late 1990s, the economy stalled again and Cardoso was forced to implement austerity measures in exchange for International Monetary Fund loans.⁴

Brazil's economic woes contributed to continuing conflict and violence against leftists, suspected criminals, and other vulnerable groups. Beginning in 1979, the rural Landless Workers' Movement (Movimento dos Trabalhadores Rurais Sem Terra, "MST") regularly occupied large farms, cattle ranches, and sugar mills, protesting the fact that 44% of all arable land in Brazil was owned by 1% of the population.⁵ Meanwhile, in urban areas, violent crime skyrocketed as residents of impoverished favelas (shantytowns) turned to drug trafficking.⁶ In response, police killed, assaulted, and harassed leftists and suspected criminals and off duty police and private citizens formed vigilante death squads.⁷ In 1996, masked men shot to death a human rights activist for investigating crimes committed by the "Golden Boys" death squad.⁸ In 1998, an armed civilian group hired by landowners to forcibly remove MST occupiers shot one of the occupiers to death.⁹ In 1999, military police repeatedly wiretapped MST organizers, continuing the military dictatorship's practice of spying extensively on leftists.¹⁰ The culture of violence extended to the most vulnerable, with one psychiatric patient dying in 1999 after hospital staff repeatedly physically restrained him, then left him in restraints bloody, bruised, and crying that

⁴ Larry Rohter, *In Free-Market Slump, Brazil's Voters Look for Change*, N.Y. TIMES (Oct. 5, 2002), <http://www.nytimes.com/2002/10/05/world/in-free-market-slump-brazil-s-voters-look-for-change.html>.

⁵ Larry Rohter, *Poor Press Brazil's Leader on His Promise of Land*, N.Y. TIMES (July 27, 2003), <http://www.nytimes.com/2003/07/27/world/poor-press-brazil-s-leader-on-his-promise-of-land.html>; Diana Jean Schemo, *The Dispossessed*, N.Y. TIMES MAG. (April 20, 1997), <http://www.nytimes.com/1997/04/20/magazine/the-dispossessed.html>.

⁶ Ernesto Londoño, *In Rio de Janeiro, 'Complete Vulnerability' as Violence Surges*, N.Y. TIMES (Nov. 18, 2017), <https://www.nytimes.com/2017/11/18/world/americas/rio-de-janeiro-brazil-violent-crime-security.html>.

⁷ John Lyons, *As Crime Rattles Brazil, Killings by Police Turn Routine*, WALL ST. J. (July 12, 2013), <https://www.wsj.com/articles/SB10001424127887323836504578553643435119434>;

HUMAN RIGHTS WATCH, "GOOD COPS ARE AFRAID" THE TOLL OF UNCHECKED POLICE VIOLENCE IN RIO DE JANEIRO (2016), https://www.hrw.org/sites/default/files/report_pdf/brazil0716web_1.pdf; HUMAN RIGHTS WATCH, LETHAL FORCE: POLICE VIOLENCE AND PUBLIC SECURITY IN RIO DE JANEIRO AND SÃO PAULO (2009), <https://www.hrw.org/sites/default/files/reports/brazil1209web.pdf>; HUMAN RIGHTS WATCH, FINAL JUSTICE: POLICE AND DEATH SQUAD HOMICIDES OF ADOLESCENTS IN BRAZIL (1994), <https://books.google.com/books?id=H11c-NS6mlMC&printsec=frontcover>; HUMAN RIGHTS WATCH, POLICE BRUTALITY IN URBAN BRAZIL (1993), <https://books.google.com/books?id=sUnhN-gnmhMC&printsec=frontcover>.

⁸ Nogueira de Carvalho et al. v. Brazil, Preliminary Objections and Merits, Inter-Am. Ct. H.R. (sec. C) No. 161 (Nov. 28, 2006), https://iachr.ils.edu/sites/iachr.ils.edu/files/iachr/Cases/tripodes_nogueira_de_carvalho_et_al._v._brazil.pdf.

⁹ Garibaldi v. Brazil, Preliminary Objections, Merits, Reparations, and Costs, Judgment, Inter-Am. Ct. H.R. (sec. C) No. 203 (Sept. 23, 2009), <https://iachr.ils.edu/cases/garibaldi-v-brazil>.

¹⁰ Escher et al. v. Brazil, Preliminary Objections, Merits, Reparations, and Costs, Judgment, Inter-Am. Ct. H.R. (ser. C) No. 200 (July 6, 2009), <https://iachr.ils.edu/cases/escher-et-al-v-brazil>; Antonio Regalado, *In Brazil, Business as Usual Often Involves Wiretapping*, WALL ST. J. (Oct. 7, 2008), <http://www.wsj.com/articles/SB122331824781908463>.

he could not breathe.¹¹ Brazil soon reached one of the highest rates of homicides by police but much of the public tolerated or actively supported the violence, seeing it as the only way to combat the terrifying and destabilizing rise in crime.¹² Today, police shootings remain common, usually occurring in the context of anti-drug operations in the favelas and disproportionately victimizing Afro-Brazilians.¹³ Activists continue to be targeted and, in 2016, there were murders of dozens of environmentalists and human rights activists, especially those defending land rights.¹⁴

Hoping for change, voters elected leftist presidential candidates but the new presidents failed to implement the desired reforms and continued to engage in corruption and repression. In 2002, voters elected Luiz Inácio Lula da Silva, a socialist who had risen from an impoverished childhood hawking peanuts on the street to become a prominent union leader and the perennial leftist presidential candidate since 1990.¹⁵ Lula won the election in part by promising moderates that he had shifted towards the center and, once in power, he swiftly angered leftist allies by continuing many of Cardoso's austerity measures and failing to follow through with MST-demanded land reforms.¹⁶ His government was also continuously beset by allegations of corruption, including embezzlement and solicitation of bribes. Nevertheless, the economy grew and Lula implemented popular anti-poverty initiatives. When Lula was termed out of office in 2010, voters elected his chief of staff, Dilma Rousseff, a former communist guerilla who had been imprisoned and tortured during the military dictatorship.¹⁷ In 2010, less than a month after Rousseff's election, the Inter-American Court of Human Rights ordered Brazil to provide justice to family members of suspected guerillas, whose decades' long efforts to find the whereabouts of their loved ones had been persistently blocked by the amnesty law.¹⁸ Rousseff declined to take the politically sensitive move of overturning the amnesty but did launch a truth commission. Rousseff wept and received a standing ovation as she announced the release of the truth commission report documenting 191 killings, 243 disappearances, and widespread torture.¹⁹

¹¹ Ximenes Lopes v. Brazil, Merits, Reparations and Costs, Inter-Am. Ct. H.R. (ser. C) No. 149 (July 4, 2006), <https://iachr.ils.edu/cases/ximenes-lopes-v-brazil>.

¹² Londoño, *supra* note 6; Lyons, *supra* note 7; U.S. DEPARTMENT OF STATE, COUNTRY REPORTS ON HUMAN RIGHTS PRACTICES FOR 2016: BRAZIL 12 (2016), <https://www.state.gov/documents/organization/265780.pdf>.

¹³ U.S. DEPARTMENT OF STATE, *supra* note 12 at 1-2.

¹⁴ *Id.* at 21.

¹⁵ Larry Rohter, *A Leftist Takes Over in Brazil and Pledges a 'New Path'*, N.Y. TIMES (Jan. 2, 2003), <http://www.nytimes.com/2003/01/02/world/a-leftist-takes-over-in-brazil-and-pledges-a-new-path.html>.

¹⁶ *Poor Press Brazil's Leader on His Promise of Land*, *supra* note 5; Larry Rohter, *Brazil's Leader Angers His Old Allies*, N.Y. TIMES (March 23, 2003), <http://www.nytimes.com/2003/03/23/world/brazil-s-leader-angers-his-old-allies.html>; Tony Smith, *Just Missing Victory, Brazil Leftist Faces Runoff in 3 Weeks*, N.Y. TIMES (Oct. 8, 2002), <http://www.nytimes.com/2002/10/08/world/just-missing-victory-brazil-leftist-faces-runoff-in-3-weeks.html>.

¹⁷ Alexei Barrionuevo, *In a First, Brazil Elects a Woman as President*, N.Y. TIMES (Oct. 31, 2010), <http://www.nytimes.com/2010/11/01/world/americas/01brazil.html>; Luisita Lopez Torregrosa, *A Woman Rises in Brazil*, N.Y. TIMES (Sept. 28, 2010), <http://www.nytimes.com/2010/09/29/world/americas/29iht-letter.html>.

¹⁸ Gomes Lund et al. ("Guerrilha do Araguaia") v. Brazil, Preliminary Objections, Merits, Reparations, and Costs, Judgment, Inter-Am. Ct. H.R. (ser. C) No. 219 (Nov. 24, 2010), <https://iachr.ils.edu/cases/gomes-lund-et-al-guerrilha-do-araguaia-v-brazil>.

¹⁹ Adam Taylor, *Brazil's Torture Report Brings A President To Tears*, THE WASHINGTON POST (Dec. 10, 2014), https://www.washingtonpost.com/news/worldviews/wp/2014/12/10/brazils-torture-report-brings-a-president-to-tears/?utm_term=.4ce176d44358. The full text of the report is available as COMISSÃO NACIONAL DA VERDADE, RELATÓRIO, <http://cnv.memoriasreveladas.gov.br/index.php/outros-destaques/574-conheca-e-acesse-o-relatorio-final-da-cnv>.

However, Rousseff was also beset by complaints about government corruption, her personal abrasiveness, and her handling of the economy.²⁰ Shortly after Rousseff assumed office in 2011, Brazil's economy began to slide amidst a global economic downturn. Rousseff was criticized for skimping on education and health spending in favor of ambitious infrastructure projects to prepare for Brazil's hosting of the 2014 World Cup and 2016 Olympics. Rousseff defended the projects as providing employment and economic stimulation but many projects went wildly over budget, were beset by corruption, and resulted in unusable buildings that were occupied by squatters and cannibalized by scrap-metal gatherers.²¹ Protests that began with a few hundred Brazilians opposing increased bus fares grew to include over a million protestors with a wide range of grievances over the economy, government spending decisions, and corruption. Police dispersed the crowds with tear gas, pepper spray, and rubber bullets, only fueling their anger.²²

Today, Brazil is fighting against serious corruption that has upended its politics and economy. Rousseff narrowly squeaked to reelection in 2014 but, as her second term began, the economy continued to worsen and a corruption investigation discovered that Petrobrás officials had agreed to rig bids in exchange for bribes, resulting in at least \$2 billion in overpayments to contractors.²³ The scandal quickly spread to politicians across Brazil and beyond, as investigators discovered that the Brazilian construction company Odebrecht had replicated the bribery scheme in countries throughout Latin America.²⁴ As the scandal unfolded, Petrobrás stock prices slid, Petrobrás made mass layoffs, and Brazil plunged into its worst recession in history.²⁵ Rousseff had been chair of Petrobrás' board when the bribery took place and, although an initial investigation cleared her of involvement, skeptical protestors took to the streets to demand her impeachment. Finally, in 2016, the Senate impeached Rousseff for manipulating the budget to make it appear that Brazil's economy was doing better than it actually was in the run-up to the

²⁰ Simon Romero and Anna Jean Kaiser, *Some See Anti-Women Backlash in Ouster of Brazil's President*, N.Y. TIMES (Sept. 7, 2016), <https://www.nytimes.com/2016/09/08/world/americas/some-see-anti-women-backlash-in-ouster-of-brazils-president.html>; Andrew Jacobs, *Dilma Rousseff, Facing Impeachment in Brazil, Has Alienated Many Allies*, N.Y. TIMES (May 1, 2016), <https://www.nytimes.com/2016/05/02/world/americas/brazil-president-dilma-rousseff-impeachment-allies-alienated.html>; Simon Romero, *Insider's Account of How Graft Fed Brazil's Political Crisis*, N.Y. TIMES (April 3, 2016), <https://www.nytimes.com/2016/04/04/world/americas/insiders-account-of-how-graft-fed-brazils-political-crisis.html>.

²¹ Simon Romero, *Grand Visions Fizzle in Brazil*, N.Y. TIMES (April 12, 2014), <https://www.nytimes.com/interactive/2014/04/12/world/americas/grand-visions-fizzle-in-brazil.html>; Michael S. Schmidt, *In Athletes' Housing at Rio Olympics: Blocked Toilets, Leaking Pipes and Exposed Wiring*, N.Y. TIMES (July 24, 2016), <https://www.nytimes.com/2016/07/25/sports/olympics/rio-olympic-village-australia.html>.

²² Simon Romero and William Neuman, *How Angry Is Brazil? Pelé Now Has Feet of Clay*, N.Y. TIMES (June 21, 2013), <http://www.nytimes.com/2013/06/22/world/americas/how-angry-is-brazil-pele-now-has-feet-of-clay.html>; Paulo Prada and Maria Carolina Marcello, *One Million March Across Brazil In Biggest Protests Yet*, REUTERS (June 20, 2013), <https://www.reuters.com/article/us-brazil-protests/one-million-march-across-brazil-in-biggest-protests-yet-idUSBRE95J15020130621>; Simon Romero and William Neuman, *Sweeping Protests in Brazil Pull In an Array of Grievances*, N.Y. TIMES (June 20, 2013), <http://www.nytimes.com/2013/06/21/world/americas/brazil-protests.html>.

²³ U.S. DEPARTMENT OF STATE, *supra* note 12 at 12-13; David Segal, *Petrobras Oil Scandal Leaves Brazilians Lamenting a Lost Dream*, N.Y. TIMES (Aug. 7, 2015), <https://www.nytimes.com/2015/08/09/business/international/effects-of-petrobras-scandal-leave-brazilians-lamenting-a-lost-dream.html>.

²⁴ Patrick Gillespie and Marilia Brocchetto, *This Company Created the World's Biggest Bribery Ring*, CNN (April 5, 2017), <http://money.cnn.com/2017/04/05/news/economy/odebrecht-latin-america-corruption/index.html>.

²⁵ *Id.*; Segal, *supra* note 23.

2014 elections.²⁶ With Rousseff out of office, the corruption scandal has only continued to expand. Lula is currently appealing a corruption conviction and Rousseff herself is now facing corruption charges.²⁷ Both the congressman who led the impeachment of Rousseff and the rival who replaced Rousseff as president are facing corruption charges of their own, as are a third of the new president's cabinet and almost two-thirds of Congress.²⁸ Today, Brazilian anti-corruption advocates' sweeping efforts to eradicate corruption are shaking Brazilian government and society.²⁹

More information

Additional background was provided by the sources below.

For historical background, see the [Encyclopedia Britannica](#) and [BBC Country Profiles](#).

For an overview of the current human rights situation from the [U.S. Department of State's 2016 Human Rights Report](#).

For information about human rights, including all relevant treaties and legal documents, see [Office of the High Commissioner for Human Rights](#).

²⁶ Simon Romero, *Dilma Rousseff Is Ousted as Brazil's President in Impeachment Vote*, N.Y. TIMES (August 31, 2016), <https://www.nytimes.com/2016/09/01/world/americas/brazil-dilma-rousseff-impeached-removed-president.html>.

²⁷ Shasta Darlington & Ernesto Londoño, *Brazilian Corruption Case Ensnarers Ex-Presidents da Silva and Rousseff*, N.Y. TIMES (Sept. 5, 2017), <https://www.nytimes.com/2017/09/05/world/americas/brazil-dilma-rousseff-lula-corruption-workers-party.html>; Ernesto Londoño, *Ex-President of Brazil Sentenced to Nearly 10 Years in Prison for Corruption*, N.Y. TIMES (July 12, 2017), <https://www.nytimes.com/2017/07/12/world/americas/brazil-lula-da-silva-corruption.html>.

²⁸ Dom Phillips, *President Michel Temer of Brazil Is Charged With Corruption*, N.Y. TIMES (June 26, 2017), <https://www.nytimes.com/2017/06/26/world/americas/brazil-temer-corruption-charge-joesley-batista.html>; Simon Romero, *Scandal in Brazil Raises Fear of Turmoil's Return*, N.Y. TIMES (May 19, 2017), <https://www.nytimes.com/2017/05/19/world/americas/brazil-michel-temer.html>; Simon Romero, *Michel Temer Government in Brazil Reels as Dozens Face New Graft Investigations*, N.Y. TIMES (April 11, 2017), <https://www.nytimes.com/2017/04/11/world/americas/brazil-michel-temer-investigation-petrobras-odebrecht.html>; Vinod Sreeharsha, *Brazilian Lawmaker Who Led Impeachment of President Is Arrested*, N.Y. TIMES (Oct. 19, 2016), <https://www.nytimes.com/2016/10/20/world/americas/brazil-eduardo-cunha.html>; Jacobs, *supra* note 20.

²⁹ Ernesto Londoño, *A Judge's Bid to Clean Up Brazil From the Bench*, N.Y. TIMES, (Aug. 25, 2017), <https://www.nytimes.com/2017/08/25/world/americas/judge-sergio-moro-brazil-anti-corruption.html>.