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# Heliodoro Portugal v. Panama

## I. COMPLIANCE AND FOLLOW-UP ADDENDUM<sup>1</sup>

**November 14, 2017:** The State fully complied with its obligation to provide reparation for the crime of forced disappearance.<sup>2</sup> However, the State failed to comply with its obligation to provide psychological and medical treatment for the victim, Mrs. Graciela de León, who died in the meantime of natural causes.<sup>3</sup> The Court kept the proceeding open regarding monitoring compliance with the following measures: (1) investigation into the violations against Mr. Heliodoro Portugal and the identification and prosecution of those responsible, and (2) providing free and immediate medical and psychological treatment to Ms. Patria Portugal and Mr. Franklin Portugal.<sup>4</sup> The State was also ordered to submit a report on the measures pending compliance by March 16, 2018.<sup>5</sup>

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<sup>1</sup> Victoria Ramirez, Author; Christian Flores, Editor; Ashley Payne, Senior IACHR Editor; Alexandra Reyna, Chief IACHR Editor; Cesare Romano, Faculty Advisor.

<sup>2</sup> Heliodoro Portugal v. Panama, Monitoring Compliance with Judgment, Order of the Court, Inter-Am. Ct. H.R. “Resolves,” ¶ 1 (Nov. 14, 2017).

<sup>3</sup> *Id.* ¶ 2; “Considering That,” ¶ 16.

<sup>4</sup> *Id.* “Resolves” ¶ 3; “Considering That,” ¶ 10.

<sup>5</sup> *Id.* “Resolves,” ¶ 5.