

Garzón Guzmán v. Ecuador

ABSTRACT¹

This case is about the forced disappearance in 1990 of a student suspected of being a member of a clandestine dissident organization. The Court found Ecuador in violation of several articles of the American Convention.

I. FACTS

A. Chronology of Events

Before August 1989: Mr. César Gustavo Garzón Guzmán is a writer and trainer.² He works at the House of Ecuadorian Culture (Casa de la Cultura Ecuatoriana) and “El Conejo” Publishing House.³ He is writing his dissertation to earn a doctoral degree.⁴

August 7, 1989: Mr. Garzón Guzmán is detained at the García Moreno Prison, accused of possession of firearms, ammunition, and explosives.⁵ He is also accused of armed assaults, theft, and attempted kidnapping.⁶ Additionally, he is accused of falsifying public documents and illegally possessing state garments.⁷ He is detained and deprived of his liberty for thirteen months.⁸ During his detention, Mr. Garzón Guzmán is tortured until he admits to his participation in “subversive activities” and affiliation with “Alfaro Vive Carajo”, also known as “Fuerzas Armadas Populares Eloy Alfaro”, a clandestine left-wing dissident group founded in 1982.⁹

September 7, 1990: The judge hearing Mr. Garzón Guzmán’s case dismisses all charges and orders his release from custody.¹⁰

November 9, 1990: In the afternoon, Mr. Garzón Guzmán goes to “El Conejo” Publishing House to receive a check.¹¹ At 5:30 p.m., he meets a friend, Ms. Miriam Liliana Vásquez, at the Exposition Center of Quito, where they are joined by another friend, Mr. Francisco Antonio Moreno.¹² Together they visit a few more locations and by 10:00 p.m., they arrive at the “Son Candela” discotheque, the last location where Mr. Garzón Guzmán is seen alive.¹³

¹ Serena Limas, Author; Charley Chen, Editor; Selene Estrada-Villela, Senior IACHR Editor; Aaron Kircher, Chief IACHR Editor; Cesare Romano, Faculty Advisor.

² Garzón Guzmán v. Ecuador, Report on Merits, Report No. 22/17, Inter-Am. Comm’n H.R., Case 11.587, ¶ 65 (March 18, 2017).

³ *Id.*

⁴ *Id.*

⁵ *Id.* ¶¶ 66-67.

⁶ *Id.* ¶ 67.

⁷ *Id.*

⁸ Garzón Guzmán v. Ecuador, Report on Merits, ¶ 66.

⁹ *Id.* ¶¶ 68-69; see Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, Judgment, Inter-Am. Ct. H.R. (ser. C) No. 434, ¶ 43 (September 1, 2021).

¹⁰ Garzón Guzmán v. Ecuador, Report on Merits, ¶ 70.

¹¹ *Id.* ¶ 72.

¹² Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶ 44; see Garzón Guzmán v. Ecuador, Report on Merits, ¶ 82.

¹³ *Id.*

November 10, 1990: Around 1:00 a.m., Mr. Moreno and Ms. Vásquez begin to leave Son Candela and see Mr. Garzón Guzmán, “in perfect physical and mental health, sober and relaxed.”¹⁴ Mr. Garzón Guzmán does not make it back home after his friends leave.¹⁵ His family notices he is missing and search the jails, hospitals, and morgue in Quito as well as other cities.¹⁶

November 11, 1990: Mr. Garzón Guzmán’s relatives go to the Investigation Service of Pichincha to file a report which is not taken because forty-eight hours have not passed yet since his disappearance.¹⁷

November 14, 1990: A classmate of Mr. Garzón Guzmán reports his disappearance to the local newspaper, “El Comercio.” The newspaper publishes an article on it.¹⁸

November 16, 1990: Ms. Fabiola Lema Ramírez, a friend of Mr. Garzón Guzmán, files a report with the National Police with identifying information about his appearance.¹⁹ The police allegedly send a telegram with this information to other internal units.²⁰

November 23, 1990: The Ecumenical Commission for Human Rights (Comisión Ecuémica de Derechos Humanos; “CEDHU”) urges the National Congress to investigate Mr. Garzón Guzmán’s disappearance.²¹

November 29, 1990: Mr. Garzón Guzmán’s mother, Ms. Clorinda Guzmán de Garzón, files a complaint to the President of the Tribunal of Constitutional Guarantees,²² requesting the urgent investigation of her son’s disappearance and alleging that his disappearance is politically motivated.²³

December 17, 1990: Ms. Ramírez requests again that an investigation is conducted into the disappearance of her friend, Mr. Garzón Guzmán.²⁴ The Chief of Criminal Investigation of Pichincha, located in the city of Quito, requests updated information from the National Police regarding the investigation.²⁵

January 8, 1991: The National Police issue the first informational report regarding the investigation relating to the disappearance of Mr. Garzón Guzmán.²⁶

February 19, 1991: The CEDHU repeat their request for the President of the Tribunal of Constitutional Guarantees to conduct an investigation.²⁷

¹⁴ Garzón Guzmán v. Ecuador, Report on Merits, ¶ 82.

¹⁵ *Id.* ¶ 85.

¹⁶ *Id.*

¹⁷ *Id.* ¶¶ 85-86.

¹⁸ *Id.* ¶ 87.

¹⁹ *Id.* ¶ 88.

²⁰ Garzón Guzmán v. Ecuador, Report on Merits, ¶ 97.

²¹ *Id.* ¶ 89.

²² *Id.* ¶ 91.

²³ *Id.*

²⁴ Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶ 46; *see* Garzón Guzmán v. Ecuador, Report on Merits, ¶ 88.

²⁵ Garzón Guzmán v. Ecuador, Report on Merits, ¶ 98.

²⁶ *Id.* ¶ 99.

²⁷ *Id.* ¶ 92.

July 1, 1991: Mr. Garzón Guzmán's family sends a letter to the Ministry of Government and Policy, communicating their concern about the police cover-ups to rehabilitate their tarnished image, while officers were responsible for detentions, tortures, and disappearances.²⁸

November 7, 1991: Ms. Guzmán de Garzón sends a letter to the President of the Republic requesting information about what happened to her son.²⁹ She also demands justice in a letter sent to the Minister of Government and the National Police.³⁰

July 30, 1991: The National Police issue their second informational report stating that they are continuing efforts to investigate Mr. Garzón Guzmán's disappearance.³¹

July 8, 1992: Ms. Guzmán de Garzón sends a new letter to the President requesting an investigation.³²

August 5, 1992: Ms. Guzmán de Garzón sends a written request to the new President-elect asking him to order an investigation upon his election.³³

August 17, 1992: Ms. Guzmán de Garzón sends a second letter to the Minister of Government and the National Police.³⁴ In this letter, she details the suffering caused by the disappearance of her son and the lack of investigation.³⁵

August 22, 1994: The National Police issue their third informational report stating that the investigation will continue until they uncover what happened to Mr. Garzón Guzmán.³⁶

May 3, 2007: The Truth Commission is created under executive Decree No. 305.³⁷

June 6, 2010: The Truth Commission publishes its final report, "Without Truth There is No Justice."³⁸ In this report, Mr. Garzón Guzmán's case is classified as a forced disappearance.³⁹

II. PROCEDURAL HISTORY

A. Before the Commission

November 8, 1994: The Commission receives a petition from the CEDHU regarding the forced disappearance of Mr. Garzón Guzmán.⁴⁰

July 20, 2010: The Commission adopts the admissibility report.⁴¹

²⁸ Garzón Guzmán v. Ecuador, Report on Merits, ¶ 93.

²⁹ *Id.* ¶ 94.

³⁰ *Id.*

³¹ *Id.* ¶ 105.

³² *Id.* ¶ 95.

³³ *Id.*

³⁴ Garzón Guzmán v. Ecuador, Report on Merits, ¶ 96.

³⁵ *Id.*

³⁶ *Id.* ¶¶ 106-107.

³⁷ Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶ 52.

³⁸ *Id.*

³⁹ *Id.* ¶¶ 52-53.

⁴⁰ Garzón Guzmán v. Ecuador, Report on Merits, ¶ 1.

⁴¹ *Id.* ¶ 5.

March 18, 2017: The Commission issues Merits Report No.22/17.⁴² The Commission recommends the State: (1) conduct a full, thorough, and impartial investigation into Mr. Garzón Guzmán's whereabouts; (2) conduct criminal and domestic proceedings in connection with the human rights violations of the forced disappearance of Mr. Garzón Guzmán; (3) make specific and adequate reparations for the human rights violations committed against Mr. César Gustavo Garzón Guzmán; (4) adopt the proper criminal measures for the lack of a diligent investigation; and (5) adopt measures to prevent the occurrence of any similar events.⁴³

B. Before the Court

July 26, 2019: The Commission submits the case to the Court after the State failed to adopt its recommendations.⁴⁴

November 12, 2019: CEDHU submits its brief on the purported violations of the State.⁴⁵

February 10, 2020: The State files its reply brief with a preliminary objection and pleadings of the Commission.⁴⁶

January 27-28, 2021: A public hearing is held on the preliminary objection and merits, reparations, and costs.⁴⁷

March 1, 2021: The State and the Commission submit their final written arguments.⁴⁸

1. Violations Alleged by Commission⁴⁹

Article 3 (Right to Juridical Personality)

Article 4(1) (Right to Life)

Article 5(1), 5(2) (Right to Humane Treatment)

Article 7 (Right to Personal Liberty)

Article 8(1) (Right to a Fair Trial)

Article 25(1) (Right to Judicial Protection)

all in relation to:

Article 1(1) (Obligation to Respect Rights) of the American Convention.

Article 1(a) (Prohibition of Practicing, Tolerating or Permitting Forced Disappearances)

Article 1(b) (Duty to Punish Forced Disappearances) of the Inter-American Convention on Forced Disappearance of Persons.

⁴² Garzón Guzmán v. Ecuador, Report on Merits, ¶150.

⁴³ *Id.*

⁴⁴ Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶¶ 2-3.

⁴⁵ *Id.* ¶ 6.

⁴⁶ *Id.* ¶ 7.

⁴⁷ *Id.* ¶ 9.

⁴⁸ *Id.* ¶ 11.

⁴⁹ Garzón Guzmán v. Ecuador, Report on Merits, ¶ 3.

2. Violations Alleged by Representative of the Victims⁵⁰

Same Violations Alleged by the Commission, plus:

Article 2 (Obligation to Give Domestic Legal Effect to Rights) of the American Convention.

III. MERITS

A. Composition of the Court⁵¹

Elizabeth Odio Benito, President
 Eduardo Vio Grossi, Judge
 Humberto Antonio Sierra Porto, Judge
 Eduardo Ferrer Mac-Gregor Poisot, Judge
 Eugenio Raúl Zaffaroni, Judge
 Ricardo Pérez Manrique, Judge

Pablo Saavedra Alessandri, Secretary
 Pomina I. Sijniensky, Deputy Secretary

B. Decision on the Merits

September 1, 2021: The Court issues its Judgment on Merits, Reparations, and Costs.⁵²

The Court found unanimously that Ecuador had violated:

Articles 3 (Right to Juridical Personality), 4(1) (Prohibition of Arbitrary Deprivation of Life), 5(1) (Right to Physical, Mental and Moral Integrity), 5(2) (Prohibition of Torture, and Cruel, Inhumane or Degrading Treatment), and 7 (Right to Personal Liberty), in relation to Article 1(1) (Obligation of Non-Discrimination) of the Convention and 1(a) (Prohibition of Practicing, Tolerating or Permitting Forced Disappearances) of the Inter-American Convention on Forced Disappearance of Persons, to the detriment of Mr. Garzón Guzmán,⁵³ because:

The Court has established that the human rights violation of forced disappearance comprises three elements: (1) the State deprivation of freedom; (2) the State-directed or acquiesced intervention of State agents and; (3) the State's refusal to recognize an individual's detention or missing information of their fate or whereabouts.⁵⁴ These elements are widely recognized by other judiciaries and have been referenced in other cases of forced disappearances committed by the State.⁵⁵

⁵⁰ Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶¶ 2, 6, 28-32. CEDHU serves as the representative of Mr. Garzón Guzmán and his relatives including: (1) his father, Mr. Julio Garzón; (2) his mother, Ms. Clorinda Guzmán de Garzón; (3) his siblings, Mr. Luis Alberto Garzón Guzmán and Mr. Rodrigo Garzón Guzmán; (4) his brother-in-law, Mr. Luis Lascano and; (5) his niece, Ms. Ana Julia Lascano.

⁵¹ Judge L. Patricio Pazmiño Freire did not participate in this case pursuant to rules 19.1 and 19.2 of the Rules of Court, as he is from Ecuador.

⁵² *Id.* ¶ 1.

⁵³ *Id.* ¶ 147(1).

⁵⁴ *Id.* ¶ 62.

⁵⁵ *Id.*

The State recognized responsibility for the forced disappearance of Mr. Garzón Guzmán, and for this reason, the Court did not rule on each individual element of forced disappearance.⁵⁶ Based on the State's assumption of international responsibility, the Court concluded that there was a violation of Mr. Garzón Guzmán's rights as recognized by Articles 3 (Right to Juridical Personality), 4(1) (Prohibition of Arbitrary Deprivation of Life), 5(1) (Right to Physical, Mental and Moral Integrity), 5(2) (Prohibition of Torture, and Cruel, Inhumane or Degrading Treatment), and 7 (Right to Personal Liberty) of the Convention, in relation to Article 1(1) (Obligation of Non-Discrimination) thereof, and Article 1(a) (Prohibition of Practicing, Tolerating or Permitting Forced Disappearances) of the Inter-American Convention on Forced Disappearance of Persons.⁵⁷

Article 8(1) (Right to a Hearing Within Reasonable Time by a Competent and Independent Tribunal) and Article 25 (Right to Judicial Protection), in relation to Article 1(1) (Obligation of Non-Discrimination) of the Convention and 1(b) (Duty to Punish Forced Disappearances) of the Inter-American Convention on Forced Disappearance of Persons, to the detriment of Mr. Garzón Guzmán and his next of kin, Mr. Julio Garzón, Ms. Guzmán de Garzón, Mr. Luis Alberto Garzón Guzmán, Mr. Rodrigo Garzón Guzmán, Mr. Luis Lascano, and Ms. Ana Julia Lascano,⁵⁸ because:

Every State has the duty to investigate and punish human rights violations.⁵⁹ This obligation has been reinforced in cases of forced disappearances since August 26, 2006, under Article 1(b) (Duty to Punish Forced Disappearances) of the Inter-American Convention on Forced Disappearance of Persons.⁶⁰ According to the Court, forced disappearances are treated as illegal acts with consequences imposed upon those involved.⁶¹ Investigation does not depend on the initiative of the victims; it is the State's legal duty.⁶² Additionally, the Court places a particular emphasis on the State's due diligence in conducting investigations.⁶³ States are required them to pursue all means necessary to determine the truth and eventually prosecute and punish those individuals responsible.⁶⁴

The Court analyzes the violations of the right to a fair trial and the right to judicial protection in three sections: (1) the State's duty to conduct investigations ex officio with due diligence; (2) the omission of due diligence in searching for Mr. Garzón Guzmán, and; (3) the guarantee to a reasonable time and right to truth.⁶⁵

For the State to initiate a criminal investigation, a formal complaint by the victim's family members is not required.⁶⁶ Within a few days, Mr. Garzón Guzmán's family notified authorities that he was missing. Regardless, the State had the obligation to launch an investigation ex officio.⁶⁷ The Court found that more than twenty years had passed before the State opened a judicial investigation, which occurred after the Truth Commission published

⁵⁶ Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶ 63.

⁵⁷ *Id.* ¶ 64.

⁵⁸ *Id.* ¶ 147(2).

⁵⁹ *Id.* ¶ 66.

⁶⁰ *Id.*

⁶¹ *Id.* ¶ 67.

⁶² Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶ 67.

⁶³ *Id.*

⁶⁴ *Id.*

⁶⁵ *Id.* ¶ 68.

⁶⁶ *Id.* ¶ 69.

⁶⁷ *Id.* ¶ 70.

their report.⁶⁸ The State did not provide any reason to justify the lack of a substantial investigation.⁶⁹ The Court held the State violated the obligation to start an investigation *ex officio* and conduct that investigation with due diligence.⁷⁰

The Court viewed due diligence in the context of a search and due diligence to investigate an offense as two separate obligations.⁷¹ The State is required to use their utmost due diligence and extinguish every possible resource when searching for disappeared persons.⁷² The Court, quoting *The Guiding Principles for the Search of Disappeared Persons*, states, “The comprehensive search of the disappeared persons should be initiated and conducted with the same effectiveness as the criminal investigation.”⁷³

Here, before the State proceeded with a judicial investigation, it had only hypothesized that either Mr. Garzón Guzmán disappeared at the hands of one of the “subversive groups,” or he had simply fled the country.⁷⁴ The State did not investigate Mr. Garzón Guzmán’s prior detention.⁷⁵ Additionally, the State only conducted a preliminary search of neighboring authorities, hospitals, clinics, and morgue.⁷⁶ The Court found this to be a violation of the State’s duty of due diligence to investigate the whereabouts or fate of an alleged disappeared person.⁷⁷

Lastly, the Court found that an excessive amount of time had passed before the investigation began in 2011 which was 20 years after the filing of the formal complaint.⁷⁸ Over 30 years had also passed since Mr. Garzón Guzmán’s disappearance without any findings or results from the State’s investigations.⁷⁹ For these reasons, the Court found the State was in violation of the right to a fair trial because Mr. Garzón Guzmán’s family and the public all had a right to know the truth of what happened.⁸⁰

Article 5(1) (Right to Physical, Mental, and Moral Integrity), in relation to Article 1(1) (Obligation of Non-Discrimination) of the Convention, to the detriment of Mr. Julio Garzón, Ms. Guzmán de Garzón, Mr. Luis Alberto Garzón Guzmán, Mr. Rodrigo Garzón Guzmán, Mr. Luis Lascano, and Ms. Ana Julia Lascano,⁸¹ because:

*The Court reaffirmed that emotional distress and severe suffering of the victim’s family members, as a direct consequence of the victim’s forced disappearance, is a violation of the right to mental and moral integrity.*⁸²

⁶⁸ Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶ 71.

⁶⁹ *Id.*

⁷⁰ *Id.* ¶ 73.

⁷¹ *Id.* ¶ 75.

⁷² *Id.* ¶ 74.

⁷³ *Id.* ¶ 75.

⁷⁴ Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶ 76.

⁷⁵ *Id.*

⁷⁶ *Id.*

⁷⁷ *Id.* ¶ 77.

⁷⁸ *Id.* ¶ 82.

⁷⁹ *Id.* ¶ 84.

⁸⁰ Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶¶ 84-86.

⁸¹ *Id.* ¶ 147(3).

⁸² *Id.* ¶¶ 90, 147.

The State had taken responsibility for the alleged violation and the consequential harm caused to the family because of Mr. Garzón Guzmán's forced disappearance and the State's ensuing inaction.⁸³ Mr. Garzón Guzmán's mother recounted her experience protesting at the Palace of Government and stated that the officers were "unpleasant" as they broke the placards protesters carried of their disappeared family member, used tear gas, and forced the protesters out of the building to a location a block away.⁸⁴

The Court found that the revictimization of Mr. Garzón Guzmán's mother and his next of kin through the suffering and anguish caused by his forced disappearance was a violation of the right to personal integrity set forth by Article 5(1) (Right to Physical, Mental, and Moral Integrity) of the American Convention, in relation to Article 1(1) (Obligation of Non-Discrimination) thereof.⁸⁵

C. Dissenting and Concurring Opinions

[None]

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 reparation.⁸⁶

2. Investigate the Forced Disappearance and Identify, Prosecute, and Punish Those Responsible

The Court recognized that an investigation was opened for the forced disappearance of Mr. Garzón Guzmán and ordered the State to continue this investigation with due diligence.⁸⁷ For the investigation to be effective, the Court noted that the State must remove the barriers that maintain impunity because Mr. Garzón Guzmán's forced disappearance was committed by State agents.⁸⁸ Due diligence also requires all State authorities to collaborate in collecting evidence and providing it to the necessary parties.⁸⁹ Throughout this investigation, the victim's family members will be entitled to the full access of justice because they have a right to know the truth of what happened.⁹⁰

The Court also ordered the State to conduct a rigorous search to determine the whereabouts of Mr. Garzón Guzmán.⁹¹ This order also requires establishing communication with the next of kin as a coordinated effort to alleviate their anguish and suffering related to

⁸³ Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶ 91.

⁸⁴ *Id.* ¶ 92.

⁸⁵ *Id.* ¶ 94.

⁸⁶ *Id.* ¶ 97.

⁸⁷ *Id.* ¶ 103.

⁸⁸ *Id.*

⁸⁹ Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶ 103.

⁹⁰ *Id.* ¶ 105.

⁹¹ *Id.* ¶ 106.

Mr. Garzón Guzmán's forced disappearance.⁹² If Mr. Garzón Guzmán's remains are found, they will be identified and delivered to his family at no cost, and any funeral expenses will be paid for by the State.⁹³

3. Rehabilitation Measures

The Court ordered that the State must provide psychological support to Mr. Garzón Guzmán's family members within six months of the judgment.⁹⁴ The family members are entitled to individual evaluations in consideration of their specific needs.⁹⁵

4. Publish the Judgment

The Court ordered that the State publish the official summary of this judgment within six months in the official gazette, in a newspaper of wide national circulation, and the entire judgment on the State's official website.⁹⁶ The State is required to notify the Court immediately once the publications have been made.⁹⁷

5. Publicly Acknowledge Responsibility

The Court ordered the State to publicly acknowledge international responsibility for the forced disappearance of Mr. Garzón Guzmán.⁹⁸ In this public acknowledgment, the State must make reference to the specific acts, the victims, and human rights violations committed.⁹⁹ The State must also ensure the participation of Mr. Garzón Guzmán family members and coordinate the necessary details of the acknowledgment including the location and date.¹⁰⁰ The State's high ranking officials should also be present for the public acknowledgment that should occur within one year from notification of the judgment.¹⁰¹

B. Compensation

The Court awarded the following amounts:

1. Pecuniary Damages

With respect to the pecuniary damages, the Court awarded the following amounts: (1) \$10,000 to Ms. Guzmán de Garzón for expenses incurred to obtain information on the whereabouts of her son;¹⁰² and (2) \$57,000 to Ms. Guzmán de Garzón as lost income that Mr. Garzón Guzmán would have made if he had not disappeared.¹⁰³

⁹² Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶¶ 109-110.

⁹³ *Id.* ¶ 110.

⁹⁴ *Id.* ¶ 114.

⁹⁵ *Id.*

⁹⁶ *Id.* ¶ 117.

⁹⁷ *Id.*

⁹⁸ Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶ 121.

⁹⁹ *Id.*

¹⁰⁰ *Id.*

¹⁰¹ *Id.*

¹⁰² *Id.* ¶ 130.

¹⁰³ *Id.* ¶ 131.

2. Non-Pecuniary Damages

With respect to the non-pecuniary damages the Court awarded the following amounts: (1) \$80,000 to Ms. Guzmán de Garzón on behalf of Mr. Garzón Guzmán;¹⁰⁴ (2) \$40,000 to Ms. Guzmán de Garzón;¹⁰⁵ (3) \$20,000 to Mr. Luis Alberto Garzón Guzmán;¹⁰⁶ (4) \$20,000 to Mr. Rodrigo Garzón Guzmán;¹⁰⁷ (5) \$20,000 to Mr. Luis Lascano;¹⁰⁸ and (6) \$20,000 to Ms. Ana Julia Lascano.¹⁰⁹

3. Costs and Expenses

The Court awarded the CEDHU \$15,000 for the costs and expenses related to the litigation of the case.¹¹⁰

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

\$282,000

C. Deadlines

The State must pay compensation for pecuniary damages, non-pecuniary damages, and cost and expenses within one year of this Judgment.¹¹¹

V. INTERPRETATION AND REVISION OF JUDGMENT

[None]

VI. COMPLIANCE AND FOLLOW-UP

[None]

VII. LIST OF DOCUMENTS

A. Inter-American Court

1. Preliminary Objections

[None]

2. Decisions on Merits, Reparations and Costs

Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, Judgment, Inter-Am. Ct. H.R. (ser. C) No. 434 (September 1, 2021).

¹⁰⁴ Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶ 134.

¹⁰⁵ *Id.* ¶ 135.

¹⁰⁶ *Id.* ¶ 136.

¹⁰⁷ *Id.*

¹⁰⁸ *Id.*

¹⁰⁹ *Id.*

¹¹⁰ Garzón Guzmán v. Ecuador, Merits, Reparations, and Costs, ¶¶ 140, 147.

¹¹¹ *Id.* ¶ 141.

3. Provisional Measures

[None]

4. Compliance Monitoring

[None]

5. Review and Interpretation of Judgment

[None]

B. Inter-American Commission

1. Petition to the Commission

[None]

2. Report on Admissibility

Garzón Guzmán v. Ecuador, Admissibility Report, Report No. 70/10, Inter-Am. Comm'n H.R., Case No. 11.587 (July 12, 2008).

3. Provisional Measures

[None]

4. Report on Merits

Garzón Guzmán v. Ecuador, Report on Merits, Report No. 22/17, Inter-Am. Comm'n H.R., Case 11.587 (March 18, 2017).

5. Application to the Court

Garzón Guzmán v. Ecuador, Letter of Submission, Inter-Am. Comm'n H.R., Case No. 11.587, ¶ (July 26, 2019).

VIII. BIBLIOGRAPHY

[None]