Communication to the Committee on the
Elimination of Discrimination Against Women

Amicus Curiae

The Due Diligence Principle in the Inter-American System
Applied to Gender-Based Violence

Case: Ángela González Carreño v. Spain
Communication No. 47/2012

Committee on the Elimination of Discrimination Against Women
Petitions Team
Office of the High Commission for Human Rights
United Nations Office at Geneva
1211 Geneva 10, Switzerland
E-mail: tb-petitions@ohchr.org

Victor Abramovich
Former Commissioner at the Inter-American Commission on Human Rights
Former Special Rapporteur on the Rights of Women

Susana Villarán
Former Commissioner at the Inter-American Commission on Human Rights
Former Special Rapporteur on the Rights of Women
## Contents of Amicus Curiae

1. Introduction .................................................................................................................. 3
2. Statement of Interest ................................................................................................... 4
3. Sources of the Due Diligence Obligation in the Inter-American System ............... 5
4. State Due Diligence Obligations For Gender-Based Violence ................................. 9
5. Non-Discrimination and the Due Diligence Principle .......................................... 13
6. Assigning State Responsibility Under the Due Diligence Principle ...................... 15
7. Conclusion .................................................................................................................... 18
1. **Introduction**

This amicus is respectfully submitted by Victor Abramovich, former Commissioner at the Inter-American Commission on Human Rights (2006-2009) and Special Rapporteur on the Rights of Women during that period, and Susana Villarán, former Commissioner at the Inter-American Commission on Human Rights (2002-2005), and Special Rapporteur on the Rights of Women from 2003 to 2004.

This amicus seeks to provide information on the due diligence standard as developed by the Inter-American system, specifically regarding domestic and gender-based violence. International human rights law requires that states respect, protect and fulfill human rights. At the same time, states cannot be held responsible for every rights violation committed by private actors. The Inter-American system, through the due diligence principle, has developed the minimum measures states must take in order to avoid legal responsibility for third party actions.¹

To explain the due diligence principle in the Inter-American context, this amicus first briefly outlines the sources of the due diligence obligation in the Inter-American system, including both treaties and cases. Next, we present what measures states are required to take under the due diligence principle to prevent, investigate, prosecute and punish and redress for human rights violations. Then, the amicus discusses the requirement that states comply with these obligations without discrimination. Based on this, we describe when violations by non-state actors may be attributed to the state. Lastly, we conclude by commenting on the particular nature of the due diligence obligation when applied in situations of gender-based violence.

This standard is a key issue in the present communication of Ángela González Carreño v. Spain, as the Spanish state was aware of both the prevalence of domestic violence in Spain and repeated instances of domestic violence in relation to the particular petitioner, yet took limited action. Here, however, we merely provide an overview of the standard from our realm of expertise, and do not analyze the specifics of the communication.

---

2. **Statement of Interest**

The contribution to the further development of the due diligence standard and its relationship to the obligation of non-discrimination by the Committee on the Elimination of Discrimination Against Women ("CEDAW Committee") could have an important global impact. Gender-based violence is a pressing problem worldwide, and the Committee’s decision could clarify relevant treaty obligations for State parties. Article 2 of the Convention on the Elimination of all Forms of Discrimination Against Women requires States to take practical measures to eliminate discrimination against women, but this obligation would benefit from translation into increasingly concrete standards to which member states can be held.

As experts in international human rights law, and specifically women’s rights, the authors are interested in the development of the due diligence standard to encourage states to equally respect, protect, and fulfill the rights of all citizens. The development of the due diligence standard in the Inter-American system has often reflected a dialogue between regional and international human rights bodies. We wish to see this dialogue continue to strengthen and refine the due diligence principle as it relates to gender-based violence.

---

3. Sources of the Due Diligence Obligation in the Inter-American System

The roots of the due diligence obligation in the Inter-American system can be found in the American Convention on Human Rights and the Inter-American Convention on the Prevention, Punishment and Eradication of Violence Against Women (“Convention of Belém do Pará”).

The American Convention lays the foundation of the due diligence obligation in Article 1(1) (Obligation to Respect Rights) and Article 2 (Domestic Legal Effects). Although the Convention, adopted in 1969, does not explicitly use the phrase due diligence, these two articles read together are the basis for the obligation.

Article 1(1) contains the obligation to both respect and ensure all rights in the Convention on a basis of non-discrimination. The requirement to ensure implies that necessary positive action will be taken to guarantee protected rights.3

Article 1(1): The States Parties to this Convention undertake to respect the rights and freedoms recognized herein and to ensure to all persons subject to their jurisdiction the free and full exercise of those rights and freedoms, without any discrimination for reasons of race, color, sex, language, religion, political or other opinion, national or social origin, economic status, birth, or any other social condition.4

Article 2 requires states to effectively guarantee protected rights in the Convention by adopting appropriate domestic measures.

Article 2: Where the exercise of any of the rights or freedoms referred to in Article 1 is not already ensured by legislative or other provisions, the States Parties undertake to adopt, in accordance with their constitutional processes and the provisions of this Convention, such legislative or other measures as may be necessary to give effect to those rights or freedoms.5

---

3 Gonzalez et al. (“Campo Algodonero”) v. Mexico, Preliminary Objection, Merits, Reparations, and Costs, Inter-Am Ct. H.R. (ser. C) No. 205, ¶ 236 (Nov. 16, 2009). (In discussing Article 1(1) the Court describes the obligation to guarantee as requiring case-specific positive action, such as the need to organize government structures in a manner that promotes human rights.).


5 Id. At art. 2.
Member states are thus bound to adopt not only legislation to incorporate the protected rights, but “other measures as may be necessary.”\(^6\)

The Inter-American Convention on the Prevention, Punishment and Eradication of Violence Against Women (“Convention of Belém do Pará”), adopted in 1994, contains an explicit due diligence provision in Article 7(b). This article specifically imposes the obligation of due diligence to prevent, investigate, and punish instances of violence against women.

\textit{Article 7} The States Parties condemn all forms of violence against women and agree to pursue, by all appropriate means and without delay, policies to prevent, punish and eradicate such violence and undertake to… (b) apply due diligence to prevent, investigate and impose penalties for violence against women.\(^7\)

The Convention of Belém do Pará therefore also requires member states to take positive action to guarantee the rights it protects. Under Article 7, this includes preventative measures, including implementing legal and administrative measures against violence against women and providing judicial recourse for victims. Lastly, Article 7(h) requires “other measures as may be necessary to give effect to this Convention.”\(^8\) Article 7 has since been held to “specify and complement the State’s obligation with regard to the compliance of the rights enshrined in the American Convention”\(^9\) and can thus be used to analyze due diligence responses to protect women from American Convention violations.\(^10\)

As the due diligence principle described in the Inter-American Convention contains little detail beyond the obligation to ensure rights, cases from the Inter-American Commission on Human Rights and the Inter-American Court of Human Rights have been essential in setting more concrete standards to prevent, investigate, and punish human rights violations. At the same time, the jurisprudence on measures required by the due diligence principle is

\(^6\)Id.
\(^7\)Inter-American Convention on the Prevention, Punishment and Eradication of Violence Against Women (“Convention of Belém do Pará”) art. 7, June 9, 1994, 33 I.L.M. 1535 (emphasis added).
\(^8\)Id.
\(^10\)Id. at ¶ 379. (In this decision the Court ultimately assigned state responsibility for Convention violations in connection with Article 7(b) of the Convention of Belém do Pará, even though the petitioners did not initially allege this violation. (Id. at ¶ 408.).)
often context specific, and it is “not possible to make a detailed list of all such measures, since they vary with the law and the conditions of each State Party.”\textsuperscript{11}

However, despite the context-specific nature of the due diligence principle, cases and reports from the Inter-American system have set out a number of requirements that commonly apply to due diligence requirements concerning violence against women. For example, early on the Inter-American Court made clear that states can incur international legal responsibility for the acts of private actors, a decision that bears significance for cases of violence against women, where the perpetrators are frequently non-state actors. The Court stated in Velásquez-Rodríguez \textit{v. Honduras} that “an illegal act which violates human rights and which is initially not directly imputable to a State (for example, because it is the act of a private person or because the person responsible has not been identified) can lead to international responsibility of the State, not because of the act itself, but because of the lack of due diligence to prevent the violation or to respond to it as required by the Convention.”\textsuperscript{12}

In 2001 the Inter-American Commission became the first international body to apply the due diligence principle to gender-based violence in \textit{Maria da Penha Maia Fernandes v. Brazil}.\textsuperscript{13} The Commission highlighted structural violence against women to develop the obligation to prevent violence against women. The Inter-American Court later declared that they would evaluate Convention obligations in light of CEDAW and the Convention of Belém do Pará when examining themes of gender-based violence, finding that “these instruments complement the international corpus juris in matters of protection of women’s right to human treatment.”\textsuperscript{14}

In 2009 the Inter-American Court of Human Rights again applied the due diligence principle to gender-based violence in Gonzalez et al. ("Campo Algodonero") \textit{v. Mexico}.\textsuperscript{15} Here the Court once more focused on how structural violence against women affects due diligence obligations. They found that when potential rights violations occur in such a context, the obligation is “more rigorous.”\textsuperscript{16} The Court expanded the idea of heightened obligations of diligence in \textit{Rosendo Cantú v. Mexico}, finding that for girl children, the state

\begin{footnotesize}
\begin{enumerate}
\item Velásquez-Rodríguez v. Honduras, Merits, Inter-Am Ct. H.R. (ser. C) No. 4, ¶ 175 (July 29, 1988).
\item Id. at ¶ 172.
\item Id. at ¶ 283.
\end{enumerate}
\end{footnotesize}
has act “with greater care and responsibility and must take special measures aimed at the best interest of the child.”

Most recently, the Inter-American Commission addressed domestic violence and the due diligence principle in *Jessica Lenahan (Gonzales) et al. v. United States.* The Commission reiterated the “strong link between discrimination, violence and due diligence, emphasizing that a State’s failure to act with due diligence to protect women from violence constitutes a form of discrimination, and denies women their right to equality before the law.” The Court thus affirmed due diligence as a binding legal principle in the Inter-American system that applies to protected substantive rights, even where diligence is not specifically mentioned.

Based on the two Conventions and these cases, we next explain in more detail state obligations under the due diligence requirements, and the requirement that states fulfill these obligations without discrimination.

---

19 *Id.* at ¶ 111.
4. State Due Diligence Obligations For Gender-Based Violence

Due diligence is composed of the positive actions that follow from the duty to guarantee rights. There are four main components to the obligation to guarantee rights. First, the state must attempt to prevent rights violations. Second, the state must promptly and effectively investigate any rights violations and identify the perpetrators. Third, the state must make efforts to prosecute and punish the perpetrators. Fourth, the state must provide reparations to the victim. If the state fails in these obligations, actions which are not committed by state actors, but by private actors, can be imputed to the state.

The first component, prevention, is a broad requirement. It can be understood as the responsibility to create conditions conducive to human rights. The Court has stated it is “the duty of States Parties to organize the governmental apparatus and, in general, all the structures through which public power is exercised, so that they are capable of juridically ensuring the free and full enjoyment of human rights.” All the structures through which public power is exercised include all “means of a legal, political, administrative and cultural nature.”

This standard was particularly affirmed for cases of gender-based violence, using the same language, in Maria da Penha. The Commission in that case noted that due to the “general pattern of negligence” of the state in acting against perpetrators of gender-based violence, they failed in their obligation of prevention.

In relation to gender-based violence, prevention additionally means that “States must adopt the required measures to modify the social and cultural patterns of conduct of men and women and to eliminate prejudices, customary practices and other practices based on the idea of the inferiority or superiority of either of the sexes, and on stereotyped roles for men and women.” Additionally, the mere existence of such measures will not be enough to

---

21Id. at ¶ 172.
23Id. at ¶ 175.
25Id. at ¶ 56.
avoid State responsibility. These measures must be “implemented in practice” so as to have actual effect.\textsuperscript{27}

The Inter-American system has also commented on prevention obligations specifically for domestic violence. State agencies charged with responding to domestic violence must provide proper training to their employees.\textsuperscript{28} To the extent that more than one agency deals with domestic violence issues, these agencies must effectively coordinate their work.\textsuperscript{29} If states issue formal protective measures to prevent rights violations in situations of domestic violence, government agents should be trained in their enforcement.

Specifically regarding children, the Commission has also noted that police forces should be made aware of the link “between domestic violence and fatal violence against children perpetrated by parents” so that they can respond accordingly should the possibility of such a situation arise.\textsuperscript{30}

Second, due diligence requires effective investigation of rights violations. This investigation must be done regardless of whether state agents were implicated in the rights violation. Investigations must “be undertaken in a serious manner and not as a mere formality.”\textsuperscript{31} This does not mean that the investigation will necessarily produce a satisfactory result,\textsuperscript{32} but that it will be conducted in good faith.\textsuperscript{33} It should not be the responsibility of the aggrieved party to insist the state initiate an investigation, but the responsibility of the state to independently initiate it.\textsuperscript{34}

An investigation that satisfies the due diligence requirement as understood in the Inter-American system will be “serious, prompt, thorough, and impartial, and must be conducted in accordance with international standards in this area.”\textsuperscript{35} At the very minimum, this

\textsuperscript{27} Id. at ¶ 163.
\textsuperscript{28} Id. at ¶ 145.
\textsuperscript{29} Id. at ¶ 145.
\textsuperscript{30} Id. at ¶ 165.
\textsuperscript{32} Id.
\textsuperscript{34} Velásquez-Rodriguez v. Honduras, Merits, Inter-Am Ct. H.R. (ser. C) No. 4, ¶ 177 (July 29, 1988).
involves collecting evidence and speaking with witnesses, and compiling and analyzing that information.\textsuperscript{36}

Additionally, as with the obligation to prevent, if women are targeted within a structural context of violence against a particular group, the obligation to investigate is “more rigorous.”\textsuperscript{37} If the violation concerns a girl child, all aspects of the investigation become “more urgent.”\textsuperscript{38} The investigation should have “a wide scope” in light of the societal need to condemn the violation.\textsuperscript{39} It should further be conducted at every phase with a “gender perspective.”\textsuperscript{40} The victims or family of the victims should be kept informed of the progress of the investigation in a manner appropriate for dealing with victims of gender-based violence.\textsuperscript{41}

The ultimate goal of such an investigation is to provide an accurate accounting of all the relevant facts.\textsuperscript{42} A proper investigation identifies any parties to be punished and thus combats impunity.

Third, the state must \textbf{prosecute and punish violators}. If the state “leaves human rights violations unpunished and the victim’s full enjoyment of human rights is not promptly restored, the state fails to comply with its positive duties under international human rights law.”\textsuperscript{43} Like the obligation to prevent and investigate, this obligation does not merely require that the possibility exists under State framework to prosecute and punish, but that this possibility is a reality due to effective implementation.\textsuperscript{44}

Fourth, \textbf{reparations} must be provided to the victim. The former United Nations Special Rapporteur on Violence Against Women has called this are the most “grossly underdeveloped” area of the due diligence standard.\textsuperscript{45} The investigation, prosecution and

\textsuperscript{38} Id. at ¶ 602(19)(vi).
\textsuperscript{39} Id. at ¶ 293.
\textsuperscript{40} Id. at ¶ 602(12)(ii).
\textsuperscript{41} Id. at ¶ 602(12)(ii).
\textsuperscript{44} Id. at ¶ 173.
punishment that result in reparations must be completed with a reasonable amount of time. A reasonable amount of time depends in part of the complexity of the case and any procedural issues that might have arisen.\textsuperscript{46}

There is no particular formula for what adequate reparations will look like, but they should provide “appropriate symbolic and actual compensation” for the harm suffered.\textsuperscript{47} In some situations the Court has considered the finding of violations a form of reparations itself.\textsuperscript{48} Reparations can include financial reparations as well as requirements that a State party institute certain programs or policies to guarantee non-repetition. In relation to domestic violence such programs might mean training police forces to respond appropriately to domestic violence and creating particular units designed to address the unique problems presented by domestic violence.\textsuperscript{49}

Finally, it is when a state fails to properly comply with any of these four due diligence obligations that they are assigned responsibility. At the same time, the failure of a state to meet due diligence obligations need not be malicious for responsibility to attach. If a state negligently fails to fulfill these substantive due diligence obligations it can still be legally responsible for rights violations committed by third parties.\textsuperscript{50}

---


\textsuperscript{47}Id. at ¶ 61(3).


5. Non-Discrimination and the Due Diligence Principle

It is an essential element of the due diligence principle that states comply with these requirements without discrimination. This means that member states “are required to use the same level of commitment in relation to prevention, investigation, punishment and provision of remedies for violence against women as they do with regards to the other forms of violence.”\(^\text{51}\) In their analysis of various factual scenarios, Inter-American bodies have repeatedly affirmed that the obligations of due diligence to protect women, girls, and other vulnerable groups are heightened due to the structural discrimination they face.\(^\text{52}\)

Too often every phase of the due diligence obligation is colored by state inability to recognize gender-based violence as a rights violation. In *Campo Algodonero* the state failed to investigate the disappearance of the young women, potentially preventing further rights violations, suggesting the victims could be off with their boyfriends.\(^\text{53}\) In *Jessica Lenahan* the police dismissed concern that the kidnapped girl children were at risk because they were with their father, despite his known history of domestic violence.\(^\text{54}\) The state thus also failed to initiate serious investigation into their whereabouts and prevent their deaths. In *Maria da Penha* the state delayed prosecution and punishment for over fifteen years, repeatedly allowing the defendant to present time-barred appeals and to remain at liberty despite a jury finding of guilt.\(^\text{55}\)

Such state failures embody stereotypes about women and gender-based violence. The Inter-American system has held that such stereotyping is both a “caus[e] and consequenc[e] of gender-based violence.”\(^\text{56}\) This failure to comply with due diligence based on gender stereotypes is a form of discrimination, in direct contravention of the non-discrimination provisions in Article 1(1) of the American Convention.\(^\text{57}\) Therefore, to meet due diligence


\(^{57}\) Id. at ¶ 402.
obligations for violence against women, states must disregard stereotypes\textsuperscript{58} to effectively implement each step of the standard without discrimination.

Additionally, certain women face increased risk for violence based on discrimination resulting from more than one factor.\textsuperscript{59} Such particularly vulnerable groups include girl children and women of ethnic and racial minorities. In the case of girl children, the due diligence obligation is heightened in view of the “broadly recognized obligation to provide special protection to children” coupled with the historical discrimination that women have faced.\textsuperscript{60}

Lastly, when the due diligence provision is applied within a discriminatory context, the state should bear the burden of proof in showing the measures taken were reasonable. This frequently comes into play when particular states or areas within states suffer structural violence against women. If the state is not responding with appropriate due diligence to this violence, they are discriminating against women.\textsuperscript{61}

Once a state engages in such discrimination, it bears the burden under a “particularly strict level of scrutiny” to justify the disparate treatment.\textsuperscript{62} This includes distinctions based on sex.\textsuperscript{63} In practice, in Campo Algodonero the Court found that as the state was “fully aware of the danger faced by these women of being subjected to violence, it has not shown that…it had adopted effective measures of prevention that would have reduced the risk factors for the women.”\textsuperscript{64}

\begin{footnotesize}
\begin{itemize}
\item \textsuperscript{58} The Court defines gender stereotyping as “a preconception of personal attributes, characteristics, or roles that correspond or should correspond to either men or women.” (Id. at ¶ 401).
\item \textsuperscript{59} Jessica Lenahan (Gonzales) et al. v. United States, Case 12.626, Inter-Am. Comm’n H. R., Report 80/11, ¶ 127 (2011).
\item \textsuperscript{60} Id. at ¶ 129.
\item \textsuperscript{63} Id.
\item \textsuperscript{64} Gonzalez et al. (“Campo Algodonero”) v. Mexico, Preliminary Objection, Merits, Reparations, and Costs, Inter-Am Ct. H.R. (ser. C) No. 205,¶ 279 (Nov. 16, 2009).
\end{itemize}
\end{footnotesize}
6. Assigning State Responsibility Under the Due Diligence Principle

States have not necessarily failed in their due diligence obligation every time private individuals violate the human rights of another. First, according to jurisprudence from the Inter-American system, the specific obligations of the due diligence principle arise when the state party knows or should know of a risk to an identifiable person or group of people. Second, due diligence obligations arise sooner under certain circumstances.

Third, what is considered a reasonable response to risk is a fact-specific inquiry. Jurisprudence mandates more aggressive measures when the risk targets vulnerable populations, such as women and children. Fourth, if the risk targets populations that suffer structural discrimination, the state bears the burden of proof in showing their response was sufficient.

First, in Campo Algodonero the Inter-American Court affirmed that due diligence obligations of adopting mechanisms to protect against third party actions come into effect when the state party becomes aware of “real and imminent danger for a specific individual or group of individuals and the reasonable possibility of preventing or avoiding that danger.” This risk requirement can thus be distilled into four components:

1. There is a real and immediate risk;
2. The risk is against a defined individual or group;
3. The state is aware or should be aware; and
4. The state can reasonably prevent or ameliorate the risk.

Additional details as to when a State should be considered aware of a real and immediate risk in situations of domestic violence were provided in the Jessica Lenahan decision. The Inter-American Commission, referring to decisions by the CEDAW Committee and the European Court of Human Rights, listed specific factors in determining State knowledge of risk.

---

66 Id. at ¶ 280.
These include situations where protection orders or restraining orders have been issued, the aggressor had been previously detained, the victim had filed complaints with the authorities, criminal proceedings had been instituted, and the parties had repeated contacts with the authorities.  

Further, the Commission specifically noted that states should be aware of the risk to children in instances where parents have filed domestic violence complaints.

Second, the Inter-American system has affirmed that in certain situations states can be considered to have knowledge of risk with less information. For example, in *Campo Algodonero* three young women and girls disappeared in a context of violence against women. Because of the dangerous environment, their disappearance made the state “aware there was a real and imminent risk that the victims would be sexually abused, subjected to ill-treatment and killed.” The possibility of further rights violations is considered more foreseeable to the state. The Court explicitly recognized that the “context of this case and the State’s international obligations impose on it a greater responsibility with regard to the protection for women.” This does not automatically mean that the state will incur responsibility for violations within this context, but that their due diligence obligations arise at a lower threshold of risk awareness.

Third, once the state is aware of a risk, they must undertake reasonable means to address the risk. What qualifies as reasonable means will be determined based on context. For example, if the risk targets a vulnerable population, the state must make additional effort to enact measures to prevent a rights violation. The Convention of Belém do Pará requires such reinforced measures for women.

---

69 *Id.* at ¶ 133.
71 *Id.* at ¶ 283.
Further, children exposed to domestic violence are considered particularly vulnerable, as they are “often common witnesses, victims, and casualties of this phenomenon.” Regarding the three kidnapped girl children in *Jessica Lenehan*, the state had a “reinforced duty of due diligence to protect them from harm and from deprivations of their life due to their age and sex, with special measures of care, prevention and guarantee.” The Commission also recognized that children in situations of domestic violence face increased risk during the period of the parents’ separation.

Therefore, due diligence obligations arise when a state is aware of a risk to a defined person or group of persons, and can take reasonable measures to alleviate that risk. This obligation is heightened when the risk presents itself in a context of violence, as potential violations are considered more foreseeable. Preventative measures must be undertaken with the utmost urgency when the risk targets vulnerable persons, including women and girl children. Lastly, if the state response occurs in a context of discrimination, the state will bear the burden in proving the measures taken were reasonable.

---

76 *Id.* at ¶ 163.
77 *Id.* at ¶ 164.
78 *Id.* at ¶ 165.
7. Conclusion

The due diligence principle provides important standards as to what states must do to comply with international rights obligations. At the very minimum, states must work to prevent, investigate, sanction, and provide reparations for rights violations committed by private actors, without discrimination. They must devote the same energy and seriousness to these tasks for all violations, including violence against women. States should be particularly attentive to disregarding gender stereotypes to ensure they are undertaking their due diligence obligations without discrimination. Should states have a history of responding discriminatorily to gender-based violence, they should have the burden of proof in showing they undertook all reasonable measures to prevent, investigate, sanction, and remedy gender-based violence related rights violations.

As soon as a state is aware of a risk to a particular person or persons, they should immediately implement preventative measures. If there already exists structural violence against women, states should be especially alert to potential rights violations, as they are aware of a heightened possibility of danger. Further, if the risk targets vulnerable groups already identified for special protection, the obligations of due diligence must be carried out with utmost urgency and seriousness. The Inter-American system has explicitly identified children in situations of domestic violence as a particularly vulnerable population.

The due diligence standard in relation to gender-based violence has been strengthened considerably in the past fifteen years in the Inter-American system, and the cases that reflect this strengthening have relied in part on the reports and jurisprudence of other treaty bodies, including the CEDAW Committee. The continued development of this standard as it relates to gender-based violence should be a priority across rights systems, as it provides an important mechanism to encourage and monitor member states’ efforts to equally guarantee protected rights.

Susana Villarán

Victor Abramovich