



Human Rights and the Rule of Law in Haiti: Key Recent Developments

June 2024 through November 2024

December 2024



About the Author

The Institute for Justice and Democracy in Haiti (IJDH) is a U.S.-based non-profit organization that works in solidarity with its Haiti-based sister organization, the *Bureau des Avocats Internationaux* (BAI), to drive systemic change in Haiti by helping Haitian activists and grassroots groups enforce their internationally recognized human rights. BAI and IJDH combine strategies including: (a) litigation in Haiti, the United States and beyond; (b) public advocacy on the streets, in the press, in academia and on social media; (c) capacity building for grassroots groups and activists; (d) training of human rights lawyers; and (e) nurturing advocacy networks and collaborations worldwide. For nearly 30 years, BAI and IJDH have kept activists safe, rallied global allies to the fight for human rights in Haiti, and impelled the justice systems to serve marginalized communities.

Acknowledgments

IJDH would like to thank Gibson Dunn attorney Nicole Waddick and University of California, Irvine School of Law student Logan Nantais for their extensive, pro bono contributions to preparing this Update.

IJDH is likewise deeply grateful to Gabrielle Apollon, Rachel Bernard, Nixon Boumba, Barbara Campbell, Rosy Auguste Ducéna, Jessica Hsu, Jake Johnston, Michelle Karshan, Melinda Miles, and Pascale Solages for additional input and feedback on drafts, and for their solidarity and collaboration with IJDH work.

IJDH further extends its deep gratitude to Respond Crisis Translation, a frequent partner of IJDH in advancing language justice, for preparing a pro bono French translation of the Update.



Table of Contents

About the Author	i
Acknowledgments	i
Table of Acronyms	iii
Executive Summary	1
I. Introduction.....	2
II. Violations of the right to life & security of the person	3
<i>Violence by armed groups and related displacement.....</i>	<i>3</i>
<i>Continuing kidnapping epidemic.....</i>	<i>4</i>
<i>Government failure to protect civilians, including human rights defenders and journalists</i>	<i>4</i>
III. Government misconduct, including institutionalized violence & corruption	5
IV. Lack of access to justice & chronic impunity	6
<i>Justice sector dysfunction and chronic impunity.....</i>	<i>6</i>
<i>Inhumane prison conditions</i>	<i>6</i>
V. Lack of equal rights & protections.....	7
VI. Collapse of economic & social rights.....	9
<i>Economy in decline.....</i>	<i>9</i>
<i>Access to water, sanitation, and hygiene.....</i>	<i>9</i>
<i>Access to food</i>	<i>10</i>
<i>Access to healthcare</i>	<i>10</i>
<i>Access to education</i>	<i>11</i>
VII. Emigration pressures.....	11
VIII. Failures of the international community to respect the rights of Haitians.....	12
Notes	15



Table of Acronyms

BINUH	United Nations Integrated Office in Haiti
BSAP	<i>Brigade de Sécurité des Aires Protégées</i> (Haiti's Brigade for the Security of Protected Areas)
CARICOM	Caribbean Community
CBP	U.S. Customs and Border Protection
CHNV	Processes for Cubans, Haitians, Nicaraguans, and Venezuelans
CPJ	Committee to Protect Journalists
CRS	U.S. Congressional Research Service
CVJR	<i>Commission Vérité, Justice, et Réparation</i> (Truth, Justice, and Reparations Commission)
DHS	U.S. Department of Homeland Security
HRW	Human Rights Watch
ICRC	International Committee of the Red Cross
IOM	International Organization for Migration
MSF	<i>Médecins Sans Frontières</i> (Doctors Without Borders)
MSS	Multinational Security Support [Mission]
OCHA	UN Office for the Coordination of Humanitarian Affairs
OHCHR	Office of the UN High Commissioner for Human Rights
PAHO	Pan American Health Organization
PHTK	<i>Pati Ayisyen Tèt Kale</i> (Haitian Tèt Kale Party)
PNH	<i>Police Nationale d'Haïti</i> (Haitian National Police)
TPC / CPT	Haiti's Transitional Presidential Council (<i>Conseil présidentiel de transition</i>)
TPS	Temporary Protected Status
ULCC	<i>Unité de Lutte Contre la Corruption</i> (Haiti's Anti-Corruption Unit)
UN	United Nations
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
UNODC	United Nations Office on Drugs and Crime
UNSC	United Nations Security Council
WFP	World Food Programme



Executive Summary

Since IJDH's last Update on Human Rights and the Rule of Law in Haiti in June, Haiti's already catastrophic insecurity and humanitarian crises have deepened further. The Transitional Presidential Council (TPC) – charged with implementing a political accord designed to advance Haiti toward fair elections and a rights-based government, addressing insecurity in a way that centers Haitian sovereignty, and ensuring justice and accountability – has struggled to fulfil its obligations. Instead, there is evidence that the TPC is repeating the patterns of corruption and state capture that defined the previous 14 years of regimes affiliated with the U.S.-backed *Pati Ayisyen Tèt Kale*.

This reporting period saw a further increase in violations of the right to life and security of the person that the government has been unable or unwilling to control, even with the partial deployment of the Multinational Security Support Mission (MSS). Most notable were a massacre in Pont-Sondé that killed at least 50, which received no police or MSS response despite advance warning; several large-scale, coordinated attacks by the *Viv Ansanm* coalition of armed groups, which displaced over 40,000 in the span of a week; and the forced shutdown of international air traffic. Armed groups continue expanding to areas previously considered safe and using brutal tactics to control the population. Over 5,000 people have been killed since January; over 700,000 are internally displaced; kidnappings remain rampant; and journalists and human rights defenders are facing increased threats without government protection. Haiti's police remain weak and largely ineffective. The unaddressed acute insecurity exacerbates the other challenges described in this Update.

Pervasive government corruption, chronic impunity, and a history of using armed groups as tools for political violence directly precipitated Haiti's crisis and the proliferation of armed groups. Members of the TPC – four of whom are embroiled in corruption scandals – and other government officials are perpetuating these patterns. In the absence of the state, violence by non-state actors, as well as by police and other government actors using illegal and indiscriminate force, has multiplied. Systemic impunity for these and other harms – including as a result of entrenched corruption and politicization of the judiciary – fuels the cycle of violence and is further delegitimizing the already struggling transitional government. Haiti's justice sector remains virtually non-functional due to systematic dismantling by corrupt governments, chronic neglect, and acute insecurity impacting court operations. High rates of pretrial detention and inhumane prison conditions amount to distinct grave human rights violations.

The insecurity and interrelated humanitarian crisis continue to disproportionately impact individuals already at the margins. This reporting period saw a material increase in gender-based violence against women and girls, especially in displacement sites. Children are particularly vulnerable to the impacts of the crisis, which armed groups are exploiting to dramatically increase child recruitment. Women, children, and other vulnerable individuals lack adequate access to resources and protections, reflecting long-standing structural discrimination. Persistent marginalization of women in the transition process – which violates Haitian women's right to equality and full participation in their government – risks perpetuating inequality and gendered harms, as well as weakening the transition.

Haiti's already catastrophic social and economic landscape has deteriorated further. Approximately 40% of Haitians live in extreme poverty and over 5.4 million are acutely food insecure, with Haiti designated a famine hotspot “of highest concern.” Widespread school and hospital closures continue to impact hundreds of thousands.

These combined challenges continue to drive Haitians to flee. Yet even as foreign states evacuate their own citizens, they continue to implement racist, inhumane, and in many cases illegal measures to restrict asylum and force Haitians back to horrific conditions. The Dominican Republic, already responsible for 95% of removals to Haiti, instituted a new program to remove 10,000 Haitians per week, resulting in additional abuses.

The above-described harms have created a desperate need for outside aid, but foreign engagement too often continues patterns that are disruptive to Haiti's long-term stability and are at the root of the present crisis in the first place. The United States and its international partners are still supporting repressive Haitian actors, enabling corruption and government dysfunction; and pushed through the MSS despite deep concerns about its capacity to deliver meaningful improvement. As predicted by Haitian civil society, the MSS has failed to meaningfully improve security and still lacks fundamentals for ensuring protections for civilians and corresponding accountability. Meanwhile, the United States' failure to stop the illicit flow of weapons to Haiti continues to fuel the horrific violence.

I. Introduction

If the previous reporting period¹ offered a moment of hope as political actors in Haiti came together to form a transitional government,¹ the last six months dashed them, demonstrating the pernicious effects of foreign influence enabling state capture by corrupt actors. Haiti's transitional government has become increasingly dysfunctional and ineffective. A combination of exclusionary practices and unaddressed grave corruption scandals has further eroded its credibility. Human rights conditions, especially with respect to insecurity and humanitarian needs, drastically deteriorated despite a partial deployment by the Multinational Security Support mission (MSS). By many accounts, the situation for people in and around Port-au-Prince is worse than any in living memory and amounts to "hell."²

International intrusion into the transitional process that sidelined civil society preferences and installed *Pati Ayisyen Tèt Kale* (PHTK)-affiliated actors on the Transitional Presidential Council (TPC) without accountability safeguards³ has predictably enabled a pattern of unaddressed corruption, power struggles, and ineffective government. Three members of the TPC⁴ are embroiled in a serious corruption scandal,⁵ and another is accused of embezzlement.⁶ None have stepped down or faced sanctions despite immense popular outcry in Haiti.⁷ By contrast, the public reactions and responses by international partners⁸ have been muted or nonexistent. The scandals have devastated public trust for an already embattled institution.⁹

On November 11, the TPC replaced Prime Minister Garry Conille with Alix Didier Fils-Aimé following escalating intragovernmental conflict.¹⁰ Mr. Conille criticized his replacement as unconstitutional¹¹ and international reactions have been unenthusiastic.¹² As of writing, it is too early to evaluate Mr. Fils-Aimé's performance; so far it has meant replacements of multiple ministers and positions lower down.¹³ In the meantime, armed groups have sought to use the ouster together with the TPC's broader challenges to justify their violence politically. The *Viv Ansanm* coalition of armed groups launched a series of attacks on inauguration day targeting poor neighborhoods traditionally opposed to the PHTK as well as international air traffic, accompanied by anti-TPC rhetoric.¹⁴

The TPC has also struggled with performing its actual functions, including specific obligations under the April 3, 2024 Political Accord for a Peaceful and Orderly Transition (**Transition Accord**).¹⁵ The Provisional Electoral Council (CEP) was incomplete until December 4, remains mired in controversy over procedural challenges and lack of transparency, and will almost certainly not be able to organize full elections by the end of 2025 as scheduled.¹⁶ The Truth, Justice, and Reparations Commission (CVJR) required by the Transition Accord was named, but has not publicly reported any significant activities. Haitian civil society criticized the lack of consultation with feminist and human rights organizations in the CVJR's formation and the inclusion of three PHTK-affiliated commissioners.¹⁷ Neither the oversight entity (Government Action Control Body) nor the National Security Council required by the Transition Accord have been formed. The TPC has also failed to comply with constitutional equity requirements such as ensuring that women hold at least 30% of all government positions.¹⁸

The poor performance of the transitional government to date is all the more disappointing given the dramatic deterioration of the security and humanitarian situation under its watch. The deployment of the MSS – still without adequate resources, personnel, or human rights safeguards – has offered little tangible benefit.¹⁹ Armed groups have continued to entrench and evolve their operations²⁰ to inflict ruthless violence;²¹ expand territorial control to areas previously unaffected;²² seize or wholly impair critical infrastructure;²³ and impact political dynamics.²⁴ Police remain unable to adequately confront the armed groups due to the persistent combination of attrition, inadequate resources, and collusion with armed groups.²⁵ Several large-scale attacks²⁶ – including a massacre of at least 50 in the commune of Pont-Sondé, which received no police or MSS protection despite advance warning, and the shutdown of international air traffic after multiple planes were shot²⁷ – are some of the more visible manifestations of the acute deterioration in conditions. They underscore the physical pain, fear, and deprivation that are the daily reality for a growing number of Haitians directly affected.²⁸ Those harms are deepened by skyrocketing hunger²⁹ and displacement,³⁰ even as medical and other services keep dwindling.³¹ Haiti's future is being consumed in the violence,³² embodied by the impact on Haitian children, who suffer privations more acutely and are being systematically forced into armed groups.³³ In the absence of state protections, civilians, sometimes jointly with police officers,³⁴ have been using increasingly vicious means of attacking suspected armed group members themselves.³⁵ The international humanitarian response nevertheless remains grossly underfunded,³⁶ and racist, illegal removals of Haitians back to the crisis persist.³⁷

¹ Previous Institute for Justice and Democracy in Haiti (IJDH) Updates are available on the IJDH website at IJDH, *News and Resources Publications: Human Rights Updates*, <https://www.ijdh.org/news-and-resources/publications/>.

II. Violations of the right to life & security of the person

This reporting period was characterized by another material increase in the scale of violence and armed groups' territorial control.³⁸ Armed groups, some operating jointly under the banner of *Viv Ansanm*,³⁹ launched multiple large-scale, coordinated attacks against people and infrastructure.⁴⁰ Widespread killing – including as a result of indiscriminate shooting⁴¹ – has drastically increased,⁴² and displacement has approximately doubled since May.⁴³ Armed groups are using the resulting desperate economic and humanitarian situation (see Section VI) as a tool to pressure young Haitians into joining their ranks.⁴⁴ Haiti's police remain unable to effectively protect the population from armed groups, even with the partial deployment of the MSS.⁴⁵ In the absence of effective state protections, a proliferating number of non-state actors are taking up weapons and participating in the fighting, contributing to an ever-more chaotic, fractured, and violent environment.⁴⁶

Violence by armed groups and related displacement

- Violence by armed groups, already at catastrophic levels, has continued to intensify.⁴⁷ The West Department, which includes Port-au-Prince, and the adjacent Artibonite Department remain epicenters of the violence,⁴⁸ though other regions are also increasingly impacted.⁴⁹ As much as 85% of the Port-au-Prince metropolitan area remains under the control of armed groups.⁵⁰ Armed groups are also more frequently targeting areas previously considered safe⁵¹ and scaling up their efforts to shut down key roads, waterways, and airports⁵² as a means of increasing revenue and establishing strategic bases.⁵³ The capital's main seaport was forced to shut down for nearly a month in September due to armed group attacks,⁵⁴ and Port-au-Prince International Airport remains closed since November 12 after armed groups shot multiple airplanes.⁵⁵
- According to the most recent UN estimates, over 5,000 people were killed in Haiti between January and November due to armed group violence,⁵⁶ an increase even relative to the previous year's high death toll.⁵⁷ Large-scale attacks have multiplied, leading to mass death and displacement.⁵⁸ On October 3, the *Gran Grif* armed group carried out one of the worst massacres Haiti has seen in decades in Pont-Sondé,⁵⁹ killing at least 50 people and displacing at least 2,000.⁶⁰ Starting November 11, the *Viv Ansanm* coalition launched coordinated attacks against several neighborhoods in Port-au-Prince.⁶¹ The attacks displaced over 40,000 people over 10 days, and killed at least 150.⁶²
- Armed groups continue to use brutality and restrictions on freedom of movement as primary tactics for advancing their aims.⁶³ Abuses include torture;⁶⁴ mutilation;⁶⁵ indiscriminate shootings and targeted executions;⁶⁶ burning people, sometimes alive;⁶⁷ using civilians as human shields;⁶⁸ and destroying and looting property.⁶⁹ Armed groups also continue to use sexual violence as a weapon.⁷⁰ They often disseminate videos of their assaults online to amplify their impact as tools of terror and control.⁷¹ Civilians who oppose criminal activities⁷² or are suspected of collaborating with the police⁷³ or self-defense groups⁷⁴ are frequent targets of violence. As armed groups continue to consolidate their control over key transportation routes⁷⁵ and disrupt air and maritime traffic,⁷⁶ they have further diminished Haitians' ability to move freely.⁷⁷ The capital is virtually cut off from the rest of the country,⁷⁸ with armed groups targeting travelers for extortion and violence⁷⁹ and killing civilians who attempt to evade checkpoints or leave communes without consent.⁸⁰ More generally, armed groups dictate many aspects of life in neighborhoods under their control.⁸¹ They sometimes portray themselves as “protectors” of the population,⁸² but in practice, generally use their control to extort money while severely restricting access to essential goods and services, including food, water, healthcare, and education.⁸³
- Haiti now has the highest level of internal displacement due to crime-related violence in the world.⁸⁴ The International Organization for Migration (**IOM**) reported 702,973 internally displaced persons (**IDPs**) as of September,⁸⁵ but that number may be even higher after attacks by armed groups in November displaced 40,965 people in just over a week.⁸⁶ Approximately 75% of people displaced from areas in the Port-au-Prince metropolitan area have fled to other departments⁸⁷ – particularly to the south⁸⁸ – where the vast majority are living with host families.⁸⁹ The resulting strain on local resources has exacerbated tensions with host communities,⁹⁰ who sometimes fear that IDPs will bring armed groups with them.⁹¹ Of those who remain in the Port-au-Prince metropolitan area, 90% are living in approximately 93 makeshift and fluctuating displacement sites,⁹² including schools, open-air spaces, churches, and government buildings.⁹³ Already dire conditions in these sites have deteriorated further still.⁹⁴ Many displacement sites in the capital are located in areas under the control of armed groups⁹⁵ and nearly half are at risk of eviction from authorities,⁹⁶ impeding aid efforts and leaving IDPs extremely vulnerable to violence⁹⁷ and further displacement.⁹⁸ Overcrowding⁹⁹ and lack of access to

adequate food, drinking water, sanitation, and health services¹⁰⁰ put IDPs at increased risk of disease.¹⁰¹ The dire living conditions and lack of security in displacement sites also exacerbate the risk of sexual violence and exploitation.¹⁰² Whatever state support or protections for IDPs exist remain inadequate.¹⁰³ Most sites lack functional management mechanisms,¹⁰⁴ and where such mechanisms do exist they exclude women,¹⁰⁵ even though women and children are the majority of those displaced.¹⁰⁶ Efforts by humanitarian organizations to provide assistance to IDPs continue to be hampered by insecurity and insufficient funding.¹⁰⁷ Over 75% of IDPs surveyed as part of a report by UN Women reported not having received any aid whatsoever.¹⁰⁸

Continuing kidnapping epidemic

- Armed groups continue to use kidnapping as a key source of income and territorial control.¹⁰⁹ According to UN reports, armed groups kidnapped 1,605 people between January and August,¹¹⁰ primarily in the Artibonite and West Departments.¹¹¹ This number likely reflects only a fraction of the total kidnappings.¹¹² Incidents of “mass kidnappings”¹¹³ are common.¹¹³ Armed groups especially target those forced to transit along main roads and waterways¹¹⁴ and those with perceived access to wealth.¹¹⁵
- Kidnapping is often accompanied by additional violence, including rape, torture, and murder, sometimes videotaped and exhibited on social media, as a mechanism for extorting higher ransoms or punishing the families of those unable to pay.¹¹⁶ Those who resist kidnappings are often shot.¹¹⁷

Government failure to protect civilians, including human rights defenders and journalists

- Despite the deployment of the MSS¹¹⁸ and an influx of foreign assistance aimed at improving police capacity,¹¹⁹ the Haitian National Police (PNH) continues to lack sufficient personnel,¹²⁰ equipment,¹²¹ weapons,¹²² and logistical and technical capacity¹²³ to effectively confront armed groups.¹²⁴ The police force continues to shrink,¹²⁵ including as a result of the government’s persistent failure to ensure adequate and timely pay and poor workplace conditions.¹²⁶ As of October 31, the official number of police officers in the country stood at 11,866,¹²⁷ over 1,000 fewer than the UN reported in June.¹²⁸ Officers who remain face extreme risk¹²⁹ and are systematically targeted by armed groups deploying military-like tactics to strengthen the protection of their territory against police incursions.¹³⁰ Approximately three officers are killed per month.¹³¹ Armed groups have been systematically attacking police infrastructure¹³² in order to facilitate their territorial expansion and prevent the PNH from retaking territory.¹³³ At least 74 out of 412 police facilities are non-operational as a result of such attacks,¹³⁴ with some reportedly being used as headquarters by armed groups.¹³⁵ As a result of these challenges, police often fail to respond to attacks¹³⁶ or flee in the face of armed groups’ superior firepower and numbers.¹³⁷ The PNH’s failure to timely intervene in the Pont-Sondé massacre despite receiving advance warning and requests for assistance, and subsequent failure to take responsibility are emblematic.¹³⁸ There is no police presence at all in many areas under the control of armed groups.¹³⁹ Even when police do engage armed groups, they are unable to project sufficient force, deploy in multiple locations, or hold territory.¹⁴⁰
- Civilian-led self-protection movements deploying force in the absence of functioning state institutions¹⁴¹ continue to expand.¹⁴² Armed civilians killed at least 436 individuals suspected of belonging to armed groups between January and September,¹⁴³ including children.¹⁴⁴ This number is likely even higher after civilians took action against armed groups attacking Pétion-Ville in November.¹⁴⁵ Not only are all of these killings extrajudicial, but some appear to be directed at individuals not engaged with armed groups.¹⁴⁶ Police,¹⁴⁷ and in some cases rival armed groups,¹⁴⁸ are increasingly operating alongside armed civilians. Some self-protection groups are also engaging in criminal activities unrelated to protection,¹⁴⁹ heightening concerns that self-protection movements are exacerbating the insecurity, contributing to the proliferation of illegal arms, and damaging community trust.¹⁵⁰ Several municipalities have also created their own police forces, which operate on the fringes of the law and give rise to similar concerns.¹⁵¹
- Journalists and human rights defenders remain under constant threat.¹⁵² Targeted attacks by armed groups against offices and staff, alongside generalized violence, have forced many human rights organizations and news outlets to suspend or reduce operations.¹⁵³ Armed group leaders have publicly

¹¹ The UN Panel of Experts defines “mass kidnappings” as “those where 10 or more persons are kidnapped in a single incident.” UN Security Council (UNSC), *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2700 (2023)*, note 106, UN Doc. S/2024/704 (Sep. 30, 2024), <https://documents.un.org/doc/undoc/gen/n24/243/73/pdf/n2424373.pdf> (hereinafter *Final report of the Panel of Experts on Haiti*).

threatened and attacked journalists reporting on their criminal activities.¹⁵⁴ Attacks on and incidental damage to telecommunications infrastructure have cut off internet access, reducing communication capacity in general, including with respect to coordinating emergency responses.¹⁵⁵ Government failures to adequately protect against, investigate, and prosecute such threats and attacks persist, leading the Committee to Protect Journalists to rank Haiti as the worst country in the world for impunity for murders of journalists.¹⁵⁶ The targeted violence and impunity, alongside generalized insecurity,¹⁵⁷ continues to threaten freedom of press and shrink civic space as a whole.¹⁵⁸

III. Government misconduct, including institutionalized violence & corruption

Pervasive government corruption and a history of using armed groups as tools for political violence directly precipitated Haiti's crisis and the proliferation of armed groups.¹⁵⁹ These patterns are being perpetuated by the transitional government. Several members of the TPC have documented connections to criminal groups or are implicated in serious corruption allegations.¹⁶⁰ The lack of meaningful investigation or sanctions is further delegitimizing and hampering the already embattled institution.¹⁶¹ Corruption, credible allegations of collusion with armed groups, and accompanying impunity is visible at all levels of the government, including the PNH.¹⁶² This permissive environment, combined with the capacity weaknesses described above, is further eroding state control and fueling a growing pattern of police and other government actors operating well beyond the law to use illegal, indiscriminate, and extrajudicial force.¹⁶³

- Government collusion with armed groups remains an impediment to restoring security and good governance.¹⁶⁴ Four of the seven voting members of the TPC come from organizations that have documented ties to criminal groups, undermining the transitional government's credibility to restore security and govern effectively.¹⁶⁵ According to the most recent report by the UN Panel of Experts, political and economic elites continue to finance criminal activities,¹⁶⁶ use armed groups to consolidate control,¹⁶⁷ and are implicated in weapons¹⁶⁸ and drug trafficking¹⁶⁹ schemes. A series of foreign sanctions against political elites with documented complicity in criminal activities offers further corroboration.¹⁷⁰ Collusion between police officers and armed groups remains widespread,¹⁷¹ despite a change in police leadership in June that was expected to improve the situation.¹⁷² Many armed group leaders are former police officers or private security guards, further exposing the deep ties between Haiti's security forces and the armed groups they purport to be fighting.¹⁷³ There is also consistent evidence that police officers provide weapons to armed groups.¹⁷⁴
- Police killed at least 1,463 people between January and September, raising concerns that officers are using excessive force as they struggle to confront armed groups.¹⁷⁵ Many of these killings occurred during anti-gang operations,¹⁷⁶ with the UN Panel of Experts reporting that 590 civilians unaffiliated with armed groups were killed during such operations between January and March.¹⁷⁷ Other killings were the result of extrajudicial executions by public prosecutors¹⁷⁸ and police.¹⁷⁹ For example, on November 11, police officers and members of a civilian "self-protection" group violently stopped a *Médecins Sans Frontières (MSF)* ambulance transporting three people with gunshot wounds. They tear-gassed and threatened the MSF staff, and executed at least two of the patients.¹⁸⁰ This incident is illustrative of the emerging dynamic of police officers operating outside the law, oftentimes alongside private actors, and the related breakdown of state control and security.¹⁸¹ In addition to these abuses, the PNH has continued to respond to Haitians demonstrating against government failures¹⁸² with violent repression.¹⁸³ Efforts by Haitian authorities to investigate and prosecute such violations are limited and controversial,¹⁸⁴ and impunity remains the norm.¹⁸⁵ Of the 108 investigations into incidents of human rights abuses by police officers opened by the General Inspectorate of the PNH between April 17 and October 7, just 15 resulted in administrative measures and only two were referred for criminal prosecution.¹⁸⁶ Even as it fails to protect journalists from violence,¹⁸⁷ the government itself limits freedom of expression. For example, in November the government suspended a political talk show after armed group leader Jimmy Chèrizier called into the show.¹⁸⁸
- Widespread corruption at all levels of the government persists and undermines state function and institutional trust.¹⁸⁹ Four members of the TPC are implicated in serious corruption allegations, exacerbating concerns about the transitional government's credibility to rebuild Haiti's democratic institutions and hold free and fair elections.¹⁹⁰ Three¹⁹¹ are accused of abuse of office, bribery and corruption,¹⁹² as corroborated in a report by Haiti's Anti-Corruption Unit (ULCC).¹⁹³ The fourth¹⁹⁴ is accused of misappropriating funds allocated for intelligence services.¹⁹⁵ All four TPC members have retained their seats on the Council¹⁹⁶ despite calls for their resignations.¹⁹⁷ Corruption goes well beyond the TPC, with former senators,¹⁹⁸ members of the PNH,¹⁹⁹ and a number of government²⁰⁰ and

diplomatic offices²⁰¹ implicated in a variety of scandals. Efforts by Haitian authorities to investigate and address allegations of corruption²⁰² rarely result in convictions.²⁰³ The lack of accountability in these cases reflects the patterns of impunity and corruption that precipitated Haiti's current crisis, as exemplified by the embezzlement of over US\$2 billion from the PetroCaribe development fund by high-ranking government officials between 2008 and 2016 and the subsequent use of armed groups to suppress popular demands for accountability.²⁰⁴

IV. Lack of access to justice & chronic impunity

Haiti's justice sector remains unable to deliver justice for the vast majority of Haitians.²⁰⁵ Its weakness is the product of chronic neglect, under-funding, and deliberate dismantling by successive corrupt governments.²⁰⁶ Acute insecurity adds additional barriers.²⁰⁷ The resulting culture of impunity, protected by entrenched corruption and politicization,²⁰⁸ feeds Haiti's cycle of violence.²⁰⁹ The miserable conditions in Haiti's prisons have deteriorated further and are exacerbated by continuing high rates of pretrial detention and serious problems with prison administration.²¹⁰ The underlying due process violations in the prisons raise serious concerns about the ability of the PNH or any foreign mission to Haiti to detain individuals as part of anti-armed group interventions in accordance with applicable law and their own operating procedures.²¹¹

Justice sector dysfunction and chronic impunity

- Court operations remain severely limited due to widespread insecurity.²¹² At least 13 courthouses in the West and Artibonite Departments remain completely shut down or have been forced to relocate due to attacks by or proximity to armed groups.²¹³ Even where courts are otherwise functional, judicial staff are sometimes unable to reach them due to the insecurity, rendering them effectively non-operational.²¹⁴ Threats, violence, and intimidation against judicial actors, which are perpetrated with almost complete impunity, continue to undermine judicial function and independence.²¹⁵
- Chronic under-resourcing likewise continues to impede court operations and the judiciary's ability to deliver fair trials.²¹⁶ The justice sector represents around just 1% of the government budget.²¹⁷ Courts lack critical equipment and facilities are dilapidated.²¹⁸ Chronic extended strikes by court personnel to protest low salaries and poor working conditions²¹⁹ further hinder judicial function.²²⁰
- Entrenched corruption and politicization of the judiciary erode access to justice.²²¹ For example, the Minister of Justice serving under the Conille government, Carlos Hercule,²²² was credibly accused of abusing his power to influence case outcomes and neglecting to properly investigate allegations that a public prosecutor had committed an extrajudicial execution during his tenure.²²³ Alleged criminals with power, affiliations with armed groups, or connections to government often are not arrested²²⁴ or are released without ever being tried.²²⁵
- The challenges described above perpetuate impunity.²²⁶ There has been virtually no progress in a number of high-profile cases, including the assassinations of former President Jovenel Moïse,²²⁷ former Port-au-Prince Bar Association President Monferrier Dorval,²²⁸ political activist Antoinette Duclair, journalists Diego Charles²²⁹ and Gary Tesse,²³⁰ and LGBTQI+ activist Charlot Jeudy.²³¹ The investigation into the PetroCaribe corruption scandal likewise remains stalled.²³² There has been little to no effort to investigate and prosecute the mass violence against the population by armed groups, including numerous high-profile massacres²³³ and countless cases of sexual violence.²³⁴ In July, after nearly six years of impunity for the La Saline massacre, Judge Jean Wilner Morin did formally charge over 30 people – including former PNH officer Jimmy Chérizier and two senior officials in the Moïse administration, Fednel Monchery and Joseph Pierre Richard Duplan²³⁵ – for their alleged involvement in the massacre.²³⁶ But no further measures have been taken and all three remain at large, with Chérizier (including in his role as one of the leaders in and spokespersons for *Viv Ansanm*²³⁷) continuing to terrorize the population with impunity.²³⁸ Although the transitional government has formally established a Truth, Justice, and Reparations Commission to investigate these and other grave abuses, it is unclear what steps the Commission has taken toward this goal.²³⁹

Inhumane prison conditions

- Haiti's prisons, where conditions violated human rights standards long before the current crisis,²⁴⁰ remain catastrophically overcrowded,²⁴¹ an ongoing challenge exacerbated by prison closures due to armed group attacks.²⁴² According to the UN, prisons are at 307% capacity, with just 0.33 square meters

of cell space per person.²⁴³ Authorities also continue to incarcerate people in makeshift cells in police stations, in similarly overcrowded and inhumane conditions.²⁴⁴ Rates of pretrial detention are at least 84%.²⁴⁵

- Incarcerated persons continue to lack access to adequate food, clean water, sanitation, and healthcare.²⁴⁶ Basic needs are provided for almost exclusively by civil society and humanitarian organizations,²⁴⁷ which are increasingly impeded in that work by insecurity.²⁴⁸ Incarcerated individuals have reported receiving only one meal per day,²⁴⁹ or even going days without food.²⁵⁰ The health consequences are dire,²⁵¹ with images of “skeletal” detainees circulating on social media.²⁵² At least 185 incarcerated individuals died in 2023²⁵³ and at least 111 more died between January and August 2024, primarily from malnutrition-related and infectious diseases.²⁵⁴
- Prison closures and overcrowding have led to minors and women being held in the same facilities as men.²⁵⁵ This exposes women and children to increased risk of violence, especially sexual violence.²⁵⁶ Children’s access to education and specialized support while incarcerated has been all but eliminated.²⁵⁷ The lack of reintegration support for adolescents increases the risk of recidivism and furthers the cycle of violence, particularly as armed groups prey on vulnerable children for recruitment.²⁵⁸
- The combination of these hardships, poor working conditions for prison staff, and the generalized insecurity creates a heightened risk of further harms and has contributed to the breakdown of due process. For example, when prison guards went on strike to demand better working conditions at the Saint-Marc civil prison in August, the Directorate of Penitentiary Administration failed to provide food to people incarcerated there, driving them to attempt a prison break.²⁵⁹ Prison archives and guard dormitories were destroyed, and police responding to the incident killed 15 unarmed incarcerated individuals, who were buried in a mass grave.²⁶⁰ In July, prison officials moving detained individuals between facilities in response to security concerns grossly violated their rights by transporting them naked in an open cattle truck.²⁶¹ These incidents are emblematic of systemic failures to treat incarcerated individuals as rights-holders.

V. Lack of equal rights & protections

The worsening security and humanitarian crises continue to impact individuals who are otherwise marginalized in distinct and compounded ways. This year saw further staggering increases in gender-based violenceⁱⁱⁱ (GBV), which primarily affects women and girls,²⁶² with growing evidence of escalating harms in situations of displacement.²⁶³ Particularly notable is an explosion in the recruitment of children into armed groups, enabled by children’s greater vulnerability to growing displacement, hunger, and other privations.²⁶⁴ Marginalized individuals continue to experience greater difficulty in accessing resources and protections, despite continued efforts by Haitian organizations, who are themselves vulnerable to the violence, to provide assistance.²⁶⁵ Underlying this dynamic are structural inequalities²⁶⁶ that remain unaddressed because of successive corrupt and exclusionary governments.²⁶⁷ The persistent marginalization of women’s leadership and priorities by Haiti’s transitional government²⁶⁸ – in spite of legal obligations to the contrary²⁶⁹ and concerted advocacy by feminist and human rights organizations²⁷⁰ – indicates the pattern is being repeated.²⁷¹ This failure to allow the equitable participation by women in the transition process further undermines its effectiveness and sustainability.²⁷²

- Systematic data for the reporting period is limited, but all evidence indicates that the scale and scope of GBV against women and girls have continued to climb to new levels of horror.²⁷³ Between April and June, service providers in several neighborhoods of Port-au-Prince began to report an average of 40 cases of rape every day,²⁷⁴ which would mean 1,200 cases per month just in those locations. This was an escalation from what had been a 40% increase in the number of GBV cases as of May (relative to March and April),²⁷⁵ up from a six-fold increase as of March (relative to January and February).²⁷⁶ There is some evidence that the unrelenting upwards trend decreased somewhat between July and October,²⁷⁷ but the overall surge in violence²⁷⁸ makes it more likely that this reflects decreased reporting instead. The UN also found a 1,000% increase in the number of sexual violence cases against children, particularly girls, in 2024 compared to last year.²⁷⁹ The staggering number of reported cases is almost certainly only a fraction of the actual incidence of GBV, as fear of retaliation, re-victimization, and

ⁱⁱⁱ According to the UN, GBV is “violence simply because of [an individual’s] sex or gender.” GBV includes, but is not limited to, “sexual, physical, mental and economic harm inflicted in public or in private” as well as “threats of violence, coercion and manipulation.” UN High Commissioner for Refugees (UNHCR), *Gender-based violence*, <https://www.unhcr.org/us/what-we-do/protect-human-rights/protection/gender-based-violence>.

social exclusion; limited access to and insufficient services for victims; and lack of trust in the justice system result in chronic underreporting.²⁸⁰

- Armed groups continue to use GBV as a tool for holding territory, punishing people living under the control of rival armed groups, and extortion.²⁸¹ Rape by multiple perpetrators is common, and victims include children under five as well as elderly women.²⁸² Kidnapped women and girls report being raped during captivity.²⁸³ Assaults occur in public spaces, in transit, and in homes.²⁸⁴ Nowhere is safe, though there is evidence that displaced women and girls are particularly vulnerable.²⁸⁵ Displacement sites are in fact becoming hotspots for GBV,²⁸⁶ including because they lack adequate security²⁸⁷ and because women are both being extorted for sex to access scarce humanitarian assistance and prevented from seeking assistance through sexual violence.²⁸⁸ While the vast majority of GBV is perpetrated by armed groups,²⁸⁹ there is evidence that, at least at displacement sites, a meaningful percentage of assailants are other actors.²⁹⁰ This combination of gendered vulnerability, weak protections, exploitation, and abuse is directly related to structural gender inequalities, including as evidenced by the exclusion of women from managing displacement sites.²⁹¹ Armed groups also continue to force women and girls into exploitative sexual relationships, including those they recruit as members.²⁹² Women and girls are sometimes compelled into accepting such arrangements by their own families.²⁹³ Indirect consequences of omnipresent GBV include reduced movement and activity by women and girls,²⁹⁴ which impedes their ability to access necessary services²⁹⁵ or participate in economic activities.²⁹⁶ The resulting loss of independence further increases vulnerability to abuse, exploitation, and survival sex.²⁹⁷
- Victims of GBV continue to face systemic barriers to accessing critical services and judicial recourse.²⁹⁸ In July, the UNFPA reported that approximately 841,000 people were in need of GBV assistance, such as temporary shelters, reproductive health kits, and other health services.²⁹⁹ Yet as of October, UNFPA's sexual and reproductive health and GBV services had received only 19% of the requisite funding.³⁰⁰ Extensive insecurity-related closures of health facilities and support organizations have further limited access to medical and psychological care, and services remain virtually non-existent for most victims.³⁰¹ The 72-hour window for timely prophylaxis for sexually transmitted infections (STIs) and emergency contraception often makes such care impossible,³⁰² and experts are concerned about resulting increases in HIV/AIDS cases compounded by insecurity-driven reductions to STI awareness, testing, and medication access programs.³⁰³ Shelters and other services for survivors of GBV remain scarce, with government support virtually nonexistent and local civil society organizations struggling to deliver assistance in spite of grave personal risk.³⁰⁴ Sexual assault remains trivialized in Haiti's justice system, with scarce prosecutions and overly lenient sentences in the few observed cases; impunity for GBV remains the norm.³⁰⁵
- The collapse of the healthcare system³⁰⁶ continues to have particularly acute and life-threatening impacts on women, especially those who are pregnant or lactating.³⁰⁷ Haiti currently has no public maternity center³⁰⁸ and its maternal mortality ratio remains the highest in the Americas.³⁰⁹ Extensive displacement has exacerbated these challenges even further, with displaced pregnant women often forced to give birth in unsafe conditions with no medical assistance.³¹⁰ Abortion remains illegal in all circumstances, including rape; and access to contraception and family planning, especially for women living in remote communities, is scarce.³¹¹
- Haiti's children are being consumed by the conflict. They are increasingly forced to participate as combatants: recruitment by armed groups³¹² reportedly increased by 70% since last year,³¹³ with 30 to 50% of armed group members now under 18.³¹⁴ Children are being killed, raped, mutilated, and abused.³¹⁵ More than 350,000 children have been displaced,³¹⁶ increasing their vulnerability to other harms;³¹⁷ a growing number of children are separated from any responsible adult.³¹⁸ Education remains drastically reduced,³¹⁹ with over 90% of children in displacement sites no longer attending school.³²⁰ The impact is particularly consequential for girls, children with disabilities, and other vulnerable populations historically marginalized in education.³²¹ Half of Haiti's children currently face acute food insecurity,³²² with the World Food Programme (WFP) estimating that nearly one quarter are already stunted in their growth due to inadequate diets.³²³ Hunger and displacement further compound children's greater susceptibility to disease.³²⁴ These intersecting harms serve to increase children's vulnerability to armed group recruitment.³²⁵ The consequences of that recruitment not only expose children to violence, forced criminal activity, and deep trauma³²⁶ – including especially high risk of GBV for girls³²⁷ – but also stigma, rejection, and violent reprisals by their communities.³²⁸ For example, a ten-year-old was reportedly killed and burned by self-protection groups after being accused of armed group involvement.³²⁹ Haiti's juvenile justice system is fundamentally unable to provide children with humane due process or access to justice,³³⁰ a limitation that, given high rates of child recruitment, must

be thoughtfully addressed in contemplating operations against armed groups and any disarmament and transitional justice efforts.³³¹

- Other marginalized groups continue to face severe discrimination, exclusion, and violence. Haiti remains extremely dangerous for LGBTQI+ persons, who report violent attacks, rape, extensive verbal harassment, and forced evictions due to their sexual orientation or gender identity.³³² There are no formal laws to protect LGBTQI+ persons from discrimination,³³³ and access to healthcare – particularly for people living with HIV – is very limited.³³⁴ Persons with disabilities also continue to face exclusion and are distinctly vulnerable to violence and insecurity.³³⁵ For example, in August 2024, a school for children with hearing and visual impairments was stormed and looted by armed groups while children remained inside.³³⁶ Haiti’s rural farmers, “*peyizan*,” continue to face significant disruptions and attacks,³³⁷ with escalating impacts on supply chains and food shortages from smaller harvests.³³⁸

VI. Collapse of economic & social rights

Haiti’s social and economic landscape has grown even more catastrophic since IJDH’s last Update. Millions of Haitians are at risk of starvation.³³⁹ Widespread closures of medical facilities are overwhelming an already collapsing health sector.³⁴⁰ Increasing poverty³⁴¹ and climate impacts³⁴² compound these challenges. Haiti’s social and economic fragility is the result of long-term under-development and institutional dysfunction³⁴³ rooted in persistent foreign interference and extraction,³⁴⁴ as well as corruption and mismanagement by Haitian officials.³⁴⁵ Addressing these structural drivers is critical to ensuring sustainable solutions to Haiti’s intersecting crises. This includes reparations for past foreign harms, in particular restitution for the debt extorted by France in 1825 in exchange for Haiti’s independence, a significant cause of Haiti’s under-development.³⁴⁶

Economy in decline

- Haiti’s economy remains in its sixth consecutive year of decline,³⁴⁷ with nearly 40% of Haitians living in extreme poverty.³⁴⁸ Inflation remains high at 25.3% as of October 2024,³⁴⁹ driving up the price of many basic goods.³⁵⁰ The food basket price has increased by at least 5% nationally in the last year.³⁵¹ As a result, food now represents up to 70% of total household expenditures.³⁵² The economic situation is particularly dire for displaced persons.³⁵³
- Armed groups continue to extract money and goods from Haitians through increasingly professionalized extortion and protection schemes³⁵⁴ and a network of checkpoints, where victims are forced to pay huge sums of money to pass.³⁵⁵ In addition to imposing protection “taxes” on businesses,³⁵⁶ armed groups also sometimes force residents to pay to access their homes³⁵⁷ or retrieve the bodies of their loved ones.³⁵⁸ Rampant looting and kidnapping further exacerbate already crushing poverty.³⁵⁹ The insecurity continues to impede trade flows³⁶⁰ and impact commercial activity,³⁶¹ resulting in reduced access to goods and increased prices.³⁶² The cost of fuel, in particular, spiked after armed groups forced the closure of the Varreux oil terminal for a week in November, leading to an acute shortage.³⁶³ The violence has also forced key informal economic centers to close,³⁶⁴ destabilized the banking sector,³⁶⁵ and driven foreign-owned companies to withdraw,³⁶⁶ impacting livelihoods.³⁶⁷

Access to water, sanitation, and hygiene

- Access to drinking water and basic hygiene and sanitation remains limited, especially in rural areas.³⁶⁸ The situation is particularly troubling in the Northwest Department,³⁶⁹ where people are forced to pay up to 125 gourdes (about US\$0.95) for a single bucket of water – an unaffordable price for many, given that 66% of Haitians are living on less than US\$3.65 per day³⁷⁰ – or dig makeshift springs and risk drinking unpotable water.³⁷¹ Displacement further reduces access.³⁷² The lack of access to clean water, hygiene, and sanitation continues to aggravate the spread of cholera and other water-borne diseases,³⁷³ and is a further driver of malnutrition.³⁷⁴ Water shortages also impact agricultural production, contributing to Haiti’s hunger crisis.³⁷⁵
- Haiti’s long-standing problems with access to water, rooted in persistent government failures to build and maintain water and sanitation infrastructure,³⁷⁶ are exacerbated by the acute insecurity crisis³⁷⁷ and climate-related challenges.³⁷⁸ The UN’s 2016 promise to improve Haiti’s water, sanitation, and hygiene infrastructure as part of its plan to eliminate UN-introduced cholera³⁷⁹ remains unfulfilled, compounding structural challenges.³⁸⁰

Access to food

- Even against the desperate conditions reported in previous Updates, Haiti’s hunger crisis has reached unprecedented levels,³⁸¹ with the WFP designating Haiti a famine hotspot “of highest concern.”³⁸² Over 5.4 million Haitians – half the country’s population – are acutely food insecure,³⁸³ representing one of the highest proportions globally.³⁸⁴ Of those 5.4 million, approximately two million are experiencing emergency-level^{IV} food insecurity.³⁸⁵ An additional 6,000 people are facing starvation, all of whom are living in makeshift internal displacement camps in the capital.³⁸⁶ The hunger crisis is expected to deepen through 2025.³⁸⁷ The UN Office for the Coordination of Humanitarian Affairs (**OCHA**) projected that 276,736 children under the age of five will suffer from acute malnutrition by the end of 2024.³⁸⁸ The most affected areas are the West and Artibonite Departments,³⁸⁹ but municipalities across Haiti are experiencing severe nutritional distress.³⁹⁰ Approximately 65% of Haitian households are unable to meet their nutritional needs³⁹¹ and many are forced to reduce the number and size of meals they eat.³⁹²
- Insecurity and inflated food prices are the proximate drivers of Haiti’s catastrophic food crisis.³⁹³ Generalized insecurity, alongside armed groups’ increasing control over territory and modes of transportation,³⁹⁴ continues to limit food distribution³⁹⁵ and exacerbate supply shortages.³⁹⁶ Even when there is food available for purchase, people are often too afraid to leave their homes to buy it.³⁹⁷ Threats and violence against rural farmers in the Artibonite Department (Haiti’s most important agricultural region) are also contributing to food shortages and increased prices.³⁹⁸ Armed groups continue to kidnap, rob, and rape women – who are an essential part of Haiti’s food distribution network – on their way to market.³⁹⁹ The acute hunger crisis, alongside the persistent lack of economic opportunity,⁴⁰⁰ is a principal factor driving recruitment by armed groups,⁴⁰¹ with children particularly at risk.⁴⁰²
- Longer-term drivers of Haiti’s protracted food insecurity include agricultural policy failures and neglect,⁴⁰³ foreign interference with Haiti’s food sovereignty,⁴⁰⁴ inadequate humanitarian support,⁴⁰⁵ and environmental challenges impacting food production.⁴⁰⁶

Access to healthcare

- Targeted violence by armed groups against hospitals and healthcare workers has continued,⁴⁰⁷ forcing most hospitals to reduce operations or to close entirely.⁴⁰⁸ Fewer than a quarter of health facilities in the Port-au-Prince metropolitan area are functioning at normal capacity,⁴⁰⁹ and nearly half are completely non-operational.⁴¹⁰ The State University Hospital, Haiti’s largest public hospital, has been closed since March due to repeated attacks and looting.⁴¹¹ As of September, just 5% of health-care services are functioning normally in the Artibonite Department.⁴¹² The situation in the rest of the country is also dire, with the UN Expert on Human Rights in Haiti reporting that just 28% of health services are functioning normally nationwide.⁴¹³ Violence by police and civilian self-protection groups is now impacting the health sector as well. MSF suspended all its activities in the Port-au-Prince metropolitan area after five incidents of threats and violence by police and civilians in just one week.⁴¹⁴ The closures, combined with the influx of patients injured by the violence,⁴¹⁵ have left the hospitals that are still functioning overwhelmed.⁴¹⁶
- Even where hospitals are operational, violence and roadblocks continue to impede physical access for patients and healthcare workers.⁴¹⁷ Persistent shortages and increased costs of oxygen,⁴¹⁸ blood,⁴¹⁹ medication,⁴²⁰ fuel,⁴²¹ and other critical supplies⁴²² – including as a result of looting⁴²³ and extortion⁴²⁴ – continue to leave patients unable to get the help they need.⁴²⁵ Even in public hospitals, meant to provide low-cost or no-cost care, patients have been forced to purchase any medical equipment needed in order to receive care.⁴²⁶ The situation is particularly dire in rural areas,⁴²⁷ where increased displacement to rural communities exacerbates the strain on local healthcare resources.⁴²⁸ Private clinics in the Northeast Department are reportedly preying on Haitians’ desperation, charging exorbitant fees for consultations and then referring patients to public hospitals because they, too, lack the equipment to provide care.⁴²⁹ These challenges – together with chronic under-resourcing of the healthcare sector⁴³⁰ – continue to drive medical professionals to emigrate⁴³¹ or leave the national healthcare system.⁴³² This contributes to staffing shortages, particularly among specialists,⁴³³ that further impede access to healthcare.⁴³⁴

^{IV} Emergency-level food crisis refers to households either living with very high acute malnutrition and excess mortality or only able to meet their food needs by resorting to emergency livelihood strategies and asset liquidation. Famine Early Warning Systems (**FEWS**), *What is the IPC?*, <https://fews.net/about/integrated-phase-classification>.

- The insecurity crisis continues to take a profound psychological toll on Haitians.⁴³⁵ According to the IOM, IDPs are at particularly high risk of suicide and experience significant fear, anxiety, and anger due to their circumstances.⁴³⁶ Children are distinctly impacted as a result of being continuously exposed to horrific violence and, in some cases, forced to commit extremely violent acts themselves.⁴³⁷ Pervasive sexual violence against women and girls continues to have serious psychological consequences.⁴³⁸ The barriers to accessing healthcare described above likewise impede access to psychological care,⁴³⁹ and are exacerbated by chronic government failures to prioritize mental health.⁴⁴⁰ Providers and front-line workers themselves also continue to be affected psychologically, impacting their ability to help others.⁴⁴¹
- Cholera – recklessly introduced to Haiti by UN peacekeepers in 2010 before reemerging in October 2022⁴⁴² – remains a daily threat, with 86,997 suspected cases, 4,858 confirmed cases, and 1,304 registered deaths as of August 31.⁴⁴³ Mortality rates for water-borne diseases in Haiti, including cholera, are the highest in Latin America and the Caribbean.⁴⁴⁴ The spread of infection is driven by long-standing problems with Haiti’s water, sanitation, and hygiene infrastructure,⁴⁴⁵ and exacerbated by the dramatic increase in displacement,⁴⁴⁶ insecurity-related deterioration of sanitary conditions and water supply,⁴⁴⁷ and the onset of the rainy season.⁴⁴⁸ High rates of malnutrition and the deterioration of the healthcare system also contribute to increased mortality rates.⁴⁴⁹

Access to education

- Targeted attacks by armed groups against schools, violence against educators, and rapidly growing displacement continue to restrict access to education.⁴⁵⁰ At the end of November, the Haitian Ministry of National Education and Vocational Training reported that nearly 3,000 schools in the West and Artibonite Departments were closed,⁴⁵¹ a dramatic increase from earlier in the year.⁴⁵² The number of schools being used as makeshift displacement sites has increased,⁴⁵³ although some have been able to keep functioning as schools during the day, while serving as shelters for the displaced at night.⁴⁵⁴ The government has not made adequate efforts to facilitate school openings.⁴⁵⁵ Altogether, these challenges have impacted 1.5 million children and teachers.⁴⁵⁶
- Even where schools remain open, attending is not safe.⁴⁵⁷ For many children, the physical journey to get to school exposes them to violence or recruitment by armed groups.⁴⁵⁸ Extortion by armed groups,⁴⁵⁹ increased displacement of children and teachers,⁴⁶⁰ and school closures are putting immense strain on the already fragile education system, particularly in rural areas.⁴⁶¹ The resulting overcrowding further impacts teachers’ ability to provide quality education.⁴⁶² The constant disruptions, combined with the psychological toll of being exposed to trauma on a daily basis, make learning difficult⁴⁶³ and contribute to lower pass rates.⁴⁶⁴
- Chronic under-resourcing and general dysfunction within the school system, exacerbated by the insecurity challenges, further disrupt access to education.⁴⁶⁵ Poor children have always faced disproportionate challenges to accessing education due to the lack of public institutions,⁴⁶⁶ but rising inflation and displacement have increased the number of families unable to pay to send their children to school.⁴⁶⁷ Government efforts to provide school supplies and financial support to children and their parents have been insufficient.⁴⁶⁸ Poor working conditions and the government’s failure to pay teachers in a timely manner – sometimes for years – continue to push educators to emigrate, resulting in a teacher shortage that exacerbates the above-described challenges.⁴⁶⁹

VII. Emigration pressures

The deteriorating conditions are pushing Haitians to resort to increasingly desperate measures to flee,⁴⁷⁰ even as they continue to be met with policies aimed at restricting asylum and otherwise preventing migration that are grounded in anti-Black racism.⁴⁷¹ Foreign states’ removals of Haitians seeking refuge at their borders have increased,⁴⁷² despite the continued deterioration of the insecurity and humanitarian crises. The Dominican Republic’s targeted program to remove 10,000 Haitians per week, in particular, has led to a myriad of human rights abuses.⁴⁷³ U.S. immigration policies continue to have the effect of excluding the most vulnerable Haitians from safety while allowing in Haitians who have developed advanced skills, many of whom are frontline workers essential to Haiti’s fight for security and stability, thereby perpetuating “brain drain.”⁴⁷⁴

- The number of Haitians seeking to escape Haiti’s deepening insecurity and humanitarian crises continues to increase.⁴⁷⁵ States’ restrictive immigration policies force Haitians fleeing for safety to take

dangerous and often deadly routes over land⁴⁷⁶ and sea.⁴⁷⁷ Voyages by boat, in particular, are increasing.⁴⁷⁸ These irregular routes expose migrants to exploitation, including by Haitian officials.⁴⁷⁹

- Foreign states continue to remove Haitians,⁴⁸⁰ despite ongoing criticism from human rights organizations,⁴⁸¹ U.S. lawmakers,⁴⁸² and the UN⁴⁸³ that these removals are hypocritical, inhumane, and, in many cases, illegal. UNICEF reported that countries forcibly returned nearly 160,000 people to Haiti between January and October.⁴⁸⁴ On October 2, the Dominican Republic – already responsible for over 95% of all removals⁴⁸⁵ – promised to begin removing up to 10,000 Haitian migrants weekly.⁴⁸⁶ Dominican authorities repatriated nearly 61,000 during the month of October alone,⁴⁸⁷ including pregnant women and children.⁴⁸⁸ Mass expulsions from the Dominican Republic are based in anti-Haitian and anti-Black prejudice,⁴⁸⁹ and Dominican authorities continue to target Haitians for removal solely on the basis of their skin color and without regard to immigration status.⁴⁹⁰ Haitians targeted for removal are transported in overcrowded box trucks;⁴⁹¹ detained, sometimes for days, without food, water, adequate hygiene, or access to medical care;⁴⁹² and subject to extortion and physical violence, including rape.⁴⁹³ The inhumane conditions of removal have resulted in deaths in custody.⁴⁹⁴ In one instance, border agents reportedly attempted to repatriate a woman’s body after she died due to lack of access to medical care, claiming she was alive but just “in bad shape.”⁴⁹⁵ Dominican authorities have reportedly stolen some Haitians’ travel documents, exacerbating their vulnerability upon removal.⁴⁹⁶ Despite the U.S. government’s repeated acknowledgment of the severity of the insecurity and humanitarian crises in Haiti,⁴⁹⁷ evacuation of U.S. citizens because of the danger,⁴⁹⁸ and the continued closure of Haiti’s principal international airport,⁴⁹⁹ the U.S. government likewise continues to remove Haitians⁵⁰⁰ in violation of their rights.⁵⁰¹
- Legal pathways to immigration in the United States remain precarious⁵⁰² and inaccessible for many. The U.S. government’s humanitarian parole program for Cubans, Haitians, Nicaraguans, and Venezuelans (CHNV) has allowed 211,010 Haitians to enter the United States between January 2023 (when it was implemented) and October 2024.⁵⁰³ However, on October 4, the U.S. government stated it would not extend the two-year CHNV parole period, putting those who do not qualify for a different form of relief when their parole period expires at risk of removal.⁵⁰⁴ They will also have to pay to return to Haiti, compounding economic hardship and vulnerability for any returnees. Fundamental flaws in the CHNV program’s design and implementation also continue to effectively exclude the most vulnerable Haitians from protection,⁵⁰⁵ leaving many feeling as though irregular migration is their only option for safety.⁵⁰⁶ The illegal limitations on asylum put in place by the Biden administration compound the resulting lack of access to protection.⁵⁰⁷ Another lifeline facing cancellation is Temporary Protected Status (TPS), which offers protection for Haitians already in the United States.⁵⁰⁸ President-elect Donald Trump has vowed to end TPS, putting the over 200,000 Haitians currently benefitting from the program at risk of deportation.⁵⁰⁹
- Haitian migrants who are returned to Haiti (“returnees”) are extremely vulnerable to Haiti’s intersecting crises.⁵¹⁰ They often arrive alone, with few resources, and in urgent need of humanitarian assistance.⁵¹¹ Many have no homes to return to due to the violence perpetrated by armed groups.⁵¹² Returned children – many of whom are unaccompanied – are particularly vulnerable to recruitment by armed groups.⁵¹³ The U.S. government continues to return Haitians to Cap-Haïtien (a city in the far north of the country) regardless of their cities of origin,⁵¹⁴ forcing many to travel long distances along dangerous routes controlled by armed groups to be reunited with their families and adding pressure on the city’s scarce resources.⁵¹⁵ Haitians repatriated from the Dominican Republic face similar difficulties traveling across armed group-controlled territories near the border.⁵¹⁶ Persons deported due to a criminal conviction continue to be arbitrarily detained upon their arrival, despite it being a clear violation of Haitian law, and are subject to discrimination because of their status.⁵¹⁷ Assistance to returnees remains grossly insufficient,⁵¹⁸ including because the international aid basket for migrants is chronically underfunded.⁵¹⁹

VIII. Failures of the international community to respect the rights of Haitians

The international community continues to play an ambiguous role in Haiti’s present moment. The ever-deepening crisis – itself rooted in persistent foreign interference and extraction⁵²⁰ – has created a desperate need for aid.⁵²¹ At the same time, international actors continue to engage in ways that are disruptive to Haiti’s long-term stability, democracy, and human rights. They have continued to prop up known partners, regardless of their track record, over efforts by the Haitian people to reclaim their institutions, undermining the transitional government’s credibility.⁵²² The MSS was imposed on Haiti in spite of deep concerns about

its capacity to deliver meaningful improvement;⁵²³ and as feared has failed to deliver, including because of predictable resource constraints.⁵²⁴ Instead of assessing the underlying strategy, the United States has been pushing to convert the MSS into a UN peacekeeping operation, which would come with its own set of funding and accountability concerns.⁵²⁵ Humanitarian assistance policies remain inadequate at best and damaging at worst.⁵²⁶ They are further undercut by the international community's persistent failure to stem the flow of foreign – mostly U.S. – weapons into Haiti.⁵²⁷

- Haiti's international partners have continued their pattern of supporting repressive Haitian actors in ways that enable corruption and government dysfunction, even as they emphasize the need to address those same issues. In the previous reporting period, the Caribbean Community (CARICOM), with U.S. support, oversaw the creation of the TPC and advocated for the inclusion of some of the same PHTK-affiliated groups that the United States has been backing for years even as they dismantled Haiti's democracy.⁵²⁸ The nominees of two of those groups are currently embroiled in a corruption scandal that has seriously undermined the transition's credibility and functionality.⁵²⁹ The same international actors who advocated for those members' inclusion in the TPC have remained largely silent about the scandal and have failed to engage on identifying a framework for confronting these serious issues, despite calls from Haitians for them to do so.⁵³⁰
- Over a year after the UN Security Council (UNSC) authorized the MSS mission to Haiti,⁵³¹ just 432 MSS personnel have been deployed.⁵³² Their presence has not made a meaningful impact on the insecurity crisis.⁵³³ Despite claims from MSS officials that the mission has had success in combatting armed groups,⁵³⁴ in recent months the violence has grown worse.⁵³⁵ Persistent funding,⁵³⁶ equipment,⁵³⁷ and personnel⁵³⁸ shortages, alongside a poorly defined mandate and a persistent lack of transparency around intended strategy and engagement protocols,⁵³⁹ are primary reasons for these failures. Tensions between MSS personnel and the PNH – including because of logistical and communication issues,⁵⁴⁰ complaints that MSS personnel are reluctant to engage armed groups directly,⁵⁴¹ the fact that most MSS personnel do not speak French or Haitian Creole,⁵⁴² and huge pay disparities between the two⁵⁴³ – further complicate the situation. MSS officials have made some progress toward establishing a reporting and accountability mechanism and have put in place several policies designed to ensure conformity with human rights standards for deployment.⁵⁴⁴ Nevertheless, fundamentals for ensuring meaningful accountability and adequate remedies for victims remain lacking.⁵⁴⁵ The mission has no specialized GBV competence or gender advisor, even though that role is envisioned as a key element of the MSS's own compliance mechanism, and no female officers at all were deployed until late October.⁵⁴⁶ BINUH⁵⁴⁷ and the Office of the UN High Commissioner for Human Rights (OHCHR)⁵⁴⁸ are expected to support human rights compliance by the MSS, but the scope of their role is unclear, adding to confusion around accountability. Following extensive pressure from Haitian and allied advocates, MSS officials engaged in some consultation with Haitian civil society, but it is not clear to what extent this consultation is shaping MSS practices around accountability. The Kenyan police's troubling human rights record makes this failure particularly concerning.⁵⁴⁹
- The United States, in a stark departure from its original position that a traditional peacekeeping mission was inappropriate for the Haitian context,⁵⁵⁰ has been pushing to transition the MSS into a full UN peacekeeping mission, including as a means of ensuring more sustainable funding.⁵⁵¹ The United States' proposal to the UNSC, which renewed the MSS's mandate for another year in September,⁵⁵² was met with clear opposition from Russia and China.⁵⁵³ Transforming the MSS into a UN peacekeeping mission would not necessarily resolve its financial problems: UN peacekeeping missions are chronically under-resourced,⁵⁵⁴ including because the United States, the single largest financial contributor to UN peacekeeping activities, owes over US\$1.1 billion in arrears.⁵⁵⁵ UN peacekeeping missions also lack adequate protections for civilians, as demonstrated by the harms of previous missions in Haiti and the ongoing lack of redress for victims.⁵⁵⁶
- High-volume arms trafficking from outside Haiti, which produces no weapons or ammunitions of its own and has been subject to a complete arms embargo for two years,⁵⁵⁷ continues to enable armed groups' territorial expansion and mass violence against the population.⁵⁵⁸ Most weapons are coming from the United States, including as acknowledged in the U.S. government's own reporting.⁵⁵⁹ Weapons are being smuggled in predominantly by sea⁵⁶⁰ or via the porous land border with the Dominican Republic.⁵⁶¹ Efforts by the United States to curb weapons trafficking to Haiti remain limited and inadequate. A number of proposed initiatives remain unimplemented;⁵⁶² U.S. controls on outbound shipments remain weak,⁵⁶³ and the U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives' (ATF) eTrace system – used to obtain information about the source of recovered weapons – has not been fully implemented in Haiti.⁵⁶⁴ Tracing requests by the UN Panel of Experts to the ATF regarding firearms

recovered in Haiti have been ignored or denied.⁵⁶⁵ Efforts by Haitian authorities to intercept arms shipments⁵⁶⁶ remain impeded by capacity constraints and insecurity,⁵⁶⁷ as well as widespread corruption.⁵⁶⁸

- Foreign states have continued to sanction Haitian individuals accused of corruption or collusion with armed groups,⁵⁶⁹ but the impact of foreign sanctions on armed groups remains negligible.⁵⁷⁰ One reason for this is the lack of meaningful follow-up by the transitional government: there is no evidence of the Haitian government having implemented any of the sanctions. Another is international actors' reluctance to sanction, at least in a meaningful manner, many of the key political actors ultimately responsible for Haiti's current crisis.⁵⁷¹ For example, U.S. sanctions against former President Michel Martelly for his well-known involvement in drug trafficking and collusion with armed groups came nearly two years after equivalent sanctions by the Canadian government,⁵⁷² and were significantly lighter than those imposed by Canada, or by the United States on others accused of similar conduct.⁵⁷³
- Haiti is among the world's most underfunded countries in terms of humanitarian aid despite increasing needs.⁵⁷⁴ As of writing, the 2024 humanitarian aid basket for Haiti was just 43.1% funded.⁵⁷⁵ Programs for children, women, and migrants are particularly underfunded.⁵⁷⁶ The rising insecurity continues to complicate aid delivery and endanger staff, exacerbating funding challenges.⁵⁷⁷ Long-standing harmful aid practices continue to impede Haiti's development, even as they purport to help.⁵⁷⁸

Notes

¹ Last April, Haiti's newly-formed Transitional Presidential Council (TPC) had a unique opportunity to break with the patterns of state capture and foreign cooptation that had defined previous successive regimes, but only if it lived up to its promise of a participatory transition. The TPC's ability to deliver on that promise depended on its ability to curtail antidemocratic machinations by members affiliated with the *Pati Ayisyen Tèt Kale* (PHTK); center diverse Haitian perspectives and needs, particularly those of women and girls; and pursue accountability (including for long-standing corruption) and reconciliation. IJDH, *Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2023 through May 2024*, p. 2 (Jun. 2024), <https://www.ijdh.org/wp-content/uploads/2024/06/Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments-December-2023-through-May-2024.pdf>.

² See, e.g., Jillian Kestler-D'Amours, *Haiti's children 'dragged into hell' as gang violence rages*, Al Jazeera (Nov. 22, 2024), <https://www.aljazeera.com/news/2024/11/22/haitis-children-dragged-into-hell-as-gang-violence-rages>.

³ See also IJDH, *Human Rights and the Rule of Law in Haiti: Key Recent Developments – June through November 2023* (Dec. 2023), <https://www.ijdh.org/wp-content/uploads/2023/12/IJDH-HRU-Dec.-2023-12.11-FINAL.pdf>, notes 471-76 and associated text; IJDH, *Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2023 through May 2024* (Jun. 2024), notes 540, 545-51 and associated text; Robenson Geffrard, *What Remains of the April 3rd Agreement?*, Le Nouvelliste (Nov. 14, 2024), <https://lenouvelliste.com/en/article/251462/what-remains-of-the-april-3rd-agreement/> (“The [April 3] agreement emphasizes the involvement of the sectors that designated the council members at nearly every stage of the transition. However, once in power, CPT members excluded these sectors from critical decisions.”).

⁴ Smith Augustin (representing EDE/RED), Louis Gerald Gilles (representing the December 21 Agreement), and Emmanuel Vertilaire (representing *Pitit Desalin*). The former two have direct ties to the PHTK, and the latter was included in the TPC thanks to pressure from the PHTK and CARICOM. IJDH, *Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2023 through May 2024* (Jun. 2024), p. 14.

⁵ Unité de lutte contre la corruption (ULCC), *Rapport d'enquête conduit par l'ULCC sur les allégations de sollicitation de cent millions de gourdes (100,000,000,00 gdes) par trois membres du Conseil Présidentiel de Transition (CPT)* (Oct. 2, 2024), https://www.haitilibre.com/docs/ULCC-Resume-Executif_241002_130345.pdf. See also note 192.

⁶ Fritz Alphonse Jean (representing the Montana Accord Monitoring Bureau). Jonasson Odigène, *Fritz Alphonse Jean and the BSA Are No Longer in Contact*, Le Nouvelliste (Nov. 11, 2024), <https://lenouvelliste.com/en/article/251382/fritz-alphonse-jean-and-the-bsa-are-no-longer-in-contact>. See also note 195.

⁷ See notes 196-74.

⁸ See note 530.

⁹ Jacqueline Charles, *How a bank bribery scandal rocking Haiti threatens U.S.-backed transition to elections*, Miami Herald (Aug. 12, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article290927264.html>. See also note 190.

¹⁰ Juhakenson Blaise, *Alix Didier Fils-Aimé sworn in as Haiti's prime minister at widely attended ceremony*, Haitian Times (Nov. 11, 2024), <https://haitiantimes.com/2024/11/11/alix-didier-fils-aime-officially-assumed-office-as-prime-minister-at-ceremony/>.

¹¹ Juhakenson Blaise, *Conille defies calls to step down as prime minister, declares move to replace him 'illegal,'* Haitian Times (Nov. 11, 2024), <https://haitiantimes.com/2024/11/11/conille-rejects-cpt-naming-fils-aime-haitian-prime-minister/>.

¹² See, e.g., AP News, *Prominent Haitian politician condemns French president for calling leaders 'total morons'* (Nov. 25, 2024), <https://apnews.com/article/haiti-french-president-insults-council-731df68a49915fef69ac59afb83062d7> (French President Emmanuel Macron called the TPC members “total morons” for replacing Conille”). Former TPC President “[Edgard] Leblanc [Fils] said ‘(Macron) did not hesitate to interfere in a matter that essentially concerns the Haitian authorities by declaring that he supported Prime Minister Conille, that the latter was formidable.’” AP News, *Prominent Haitian politician condemns French president for calling leaders 'total morons'* (Nov. 25, 2024).

¹³ Juhakenson Blaise, *Haiti's Prime Minister Alix Didier Fils-Aimé officially names cabinet*, Haitian Times (Nov. 16, 2024), <https://haitiantimes.com/2024/11/16/alix-didier-fils-aime-officially-names-new-ministry-cabinet/>.

¹⁴ The *Viv Ansanm* coalition of armed groups spokesperson Jimmy Chérizier called for the resignation of the TPC and promised the coalition would “use all its means to achieve [its] departure” on the same day the coalition launched a series of attacks in the immediate aftermath of the ouster. See, e.g., Al Jazeera, *Haitian authorities say 28 alleged gang members killed by police, residents* (Nov. 19, 2024), <https://www.aljazeera.com/news/2024/11/19/haitian-authorities-say-28-alleged-gang-members-killed-by-police-residents>. See also Romain Le-Cour-Grandmaison, *Haiti, caught between political paralysis and escalating violence*, Global Initiative Against Transnational Organized Crime (GI-TOC) (Nov. 25, 2024), <https://globalinitiative.net/analysis/haiti-caught-between-political-paralysis-and-escalating-violence/> (“[T]he apathetic response of the authorities. . . bolsters gang leaders' bravado. Jimmy Chérizier, the spokesman for Viv Ansanm, ridiculed the impotence of the Haitian authorities and the international community, and called for the downfall of the Transitional Presidential Council.”).

¹⁵ One embodiment of the TPC's deep dysfunction is the never-corrected failure to publish the Transition Accord in *Le Moniteur*, as required for government edicts. *Accord politique pour une transition pacifique et ordonnée* (Apr. 3, 2024), <https://www.haitilibre.com/docs/accord-politique-pour-une-transition-pacifique-et-ordonnee.pdf>; Geffrard, *What Remains of the April 3rd Agreement?* (Nov. 14, 2024) (“Not only was the agreement never published in the official government journal *Le Moniteur*, but the Presidential Council also distorted its provisions, adopting practices that allowed them to consolidate power while sidelining key stakeholders.”).

¹⁶ The process for appointing seven members from seven pre-determined “sectors” broke down over questions of transparency and process. See, e.g., RL News Haiti, *Nomination à la DGI et au CEP : tensions autour des décisions du Conseil des ministres* (Dec. 5, 2025), <https://rlnewshaiti.com/nomination-a-la-dgi-et-au-cep-tensions-autour-des-decisions-du-conseil-des-ministres/>; @KayFanmAyiti, X (Sep. 27, 2024), <https://x.com/KayFanmAyiti/status/1839745570367213826>; John Smith Justin, *Human Rights Sector Divided Over Formation of the CEP*, Le Nouvelliste (Aug. 23, 2024), <https://lenouvelliste.com/en/article/249853/human-rights-sector-divided-over-formation-of-the-cep>; AlterPresse, *Haïti-Élections : La Pohdh qualifie de « farce » le choix de Gédéon Jean comme représentant du secteur des droits humains au Cep* (Sep. 16, 2024), <https://www.alterpresse.org/spip.php?article30904>; Gazette Haiti, *Choix de représentants au CEP : la POHHD questionne les actions de Frinel Joseph* (Aug. 7, 2024), <https://www.gazettehaiti.com/node/11220>; Ensemble des Citoyens Compétents à la Recherche de l'Égalité des Droits de l'Homme en Haïti (ECCREDHH), *POHHD et OCNH seront les principaux responsables de cette nouvelle crise de Représentativité des Droits Humains au Conseil Electoral Provisoire (CEP)*, Facebook (Jul. 31, 2024), https://www.facebook.com/groups/1803772329842586/posts/3875061302713668/?_rdr; Jonasson Odigène, *CEP Formation: POHHD Propose Initiatives for Human Rights*, Le Nouvelliste (Sep. 27, 2024), <https://lenouvelliste.com/en/article/250550/cep-formation-pohdh-proposes-initiatives-for-human-rights>; Veron Arnault, *CEP: Sant Karl Levêque (SKL) dénonce la POHHD et appelle au respect des règles démocratiques*, Le National (Sep. 14, 2024), https://lenational.org/post_article.php?pol=5433; Tripotay Lakay, *Gwo eskandal pete douvan local òganizasyon “KAY FANM” sou chwa re...*, Facebook (Aug. 26, 2024), <https://www.facebook.com/Tripotayhaitien/videos/433177709869203/?vh=e&mibextid=j8LeHn>. On October 18, former Prime Minister Conille installed an incomplete CEP with two of the seven seats outstanding. Jean Pharès Jérôme, *On the Road to Elections*, Le Nouvelliste (Oct. 18, 2024), <https://lenouvelliste.com/en/article/250983/on-the-road-to-elections>. Two members were installed to fill the vacant seats on December 4, though it is not clear what process was used. Haiti24, *Conseil Électoral Provisoire : l'Exécutif finalise la liste avec deux nouvelles figures féminines* (Dec. 5, 2024), <https://haiti24.net/conseil-electoral-provisoire-lexecutif-finalise-la-liste-avec-deux-nouvelles-figures-feminines/>. The CEP has undertaken some activities, but the procedural irregularities and lack of transparency in its constitution and function to date undermine its credibility to put together free and fair elections that will be perceived as legitimate. See, e.g., Haiti Libre, *Haiti – Elections : First activities of the CEP* (Nov. 6, 2024), <https://www.haitilibre.com/en/news-43574-haiti-elections-first-activities-of-the-cep.html>; Vant Bèf Info, *Elections: le CEP teste les capacités de la machine électorale* (Dec. 4, 2024), <https://vantbefinfo.com/elections-le-cep-teste-les-capacites-de-la-machine-electorale/>. Even without the legitimacy issues surrounding the CEP and the untamed insecurity that makes public activities like campaigning and voting life-threatening, Haiti faces many practical hurdles to holding credible elections, compounded by a long history of electoral manipulation and corruption. See Philippe de Bard, *In Haiti, as Elsewhere, Elections Alone Are Not the Answer*, Foreign Policy (Mar. 12, 2024), <https://foreignpolicy.com/2024/03/12/haiti-gang-violence-elections-ariel-henry-resignation/>. The extra-constitutional nature of the present moment makes it all the more critical that election-related activities and institutions build and work from some minimum public consensus and procedural clarity; yet both seem to be patently absent.

¹⁷ Nou Pap Dòmi, *Plateforme des Organisations Haïtiennes des Droits Humains (POHHD), Réseau National de Défense des Droits Humains (RNDDH), Nou Pap Dòmi, POHHD et RNDDH dénoncent la création de la Commission Vérité, Justice et Réparation* (Oct. 2, 2024), <https://web.rnndh.org/wp-content/uploads/2024/10/1-Note-CVJR-NPD-POHHD-RNDDH-02Octobre2024.pdf>.

¹⁸ See, e.g., Pascale Solages & Sasha Filippova, *What Haiti's political transition should be doing for Haiti's women – and isn't*, The New Humanitarian (Sep. 4, 2024), <https://www.thenewhumanitarian.org/opinion/2024/09/04/what-haiti-political-transition-should-be-doing-and-isnt-women> (“Women are being excluded from decision-making: There is only one woman on Haiti's nine-member Transitional Presidential Council (CPT), and she is one of two members with no vote. No women were interviewed for the role of interim prime minister.”); *Letter from civil society organizations to Mr. Alix Didier Fils-Aimé, Interim Prime Minister, and Mr. Leslie Voltaire, President of the Transitional Presidential Council* (Nov. 25, 2024), <https://www.ijdh.org/wp-content/uploads/Open-Letter-EN-Demand-to-respect-the-Constitutional-and-human-rights-of-Haitis-women-and-girls-by-centering-those-rights-in-transitional-government-policies-and-appointments.pdf> (“[M]ore literally missing are women in leadership and decision-making positions who are dedicated to advancing the rights of women and girls and safeguarding the transition, and are empowered to do so. Instead, the number of posts occupied by women have actually been reduced in the new cabinet to just 4 out of 18 – well below the Constitutional minimum of 30 percent. Notably, it is two of the more powerful ministries – the Ministry of Foreign and Religious Affairs and the Ministry of the Economy and Finance – that no longer benefit from women's leadership.”). See also notes 268-72.

¹⁹ See Section VIII.

²⁰ See generally GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 2* (Nov. 2024), <https://riskbulletins.globalinitiative.net/download/ht-obs-002-screen-pdf.pdf>.

²¹ See notes 63-74 and associated text.

²² See note 51.

²³ See notes 52-55 and associated text.

²⁴ See GI-TOC, *Will the Artibonite massacre be a turning point in Haiti?* (Oct. 9, 2024), <https://globalinitiative.net/analysis/artibonite-massacre-haiti/> (“The assassination of several judges and lawyers, in April and May 2024, also illustrates the involvement of criminal groups in political violence, and their desire to directly influence institutional life not only through their political patrons but also through the elimination of key stakeholders”).

²⁵ See Sections II and III.

²⁶ Notable attacks were carried out during the reporting period in Ganthier, Gressier, Pont-Sondé, Solino, and Pétiyon-Ville. See notes 58-62 and associated text.

²⁷ See note 55.

²⁸ See, e.g., Pascale Solages, *Six Haitian women's struggles to recover from rape by gangs*, The New Humanitarian (Nov. 29, 2024), <https://www.thenewhumanitarian.org/opinion/first-person/2024/11/19/six-haitian-women-struggles-recover-rape-gangs> (“The painful physical, emotionally devastating, and often lonely experiences of Haiti's women and girls can become lost in the immensity of the overall violence, or seem almost abstract as the assaults become so routine.”).

²⁹ See Section VI (Access to food)

³⁰ See notes 84-86 and associated text.

³¹ See generally Section VI.

³² The conflict is devouring not just the bodies of Haitians, but also their rich cultural heritage. Some of the oldest artistic communities in the Caribbean are at risk of collapse under attacks, destruction, artist displacement and emigration, and resource scarcity. Haiti's leading public art collections are likewise threatened. Ervenshy Hugo Jean-Louis, *Major artistic communities threatened with extinction in Haiti*, Ayibo Post (Jun. 17, 2024), <https://ayibopost.com/major-artistic-communities-threatened-with-extinction-in-haiti/>. See also Tom Phillips & Etienne Côté-Paluck, *'An act of rebellion': Haitian theatre persists amid political crisis and violence*, The Guardian (Dec. 6, 2024), <https://www.theguardian.com/world/2024/dec/06/haiti-theatre-political-crisis-violence>.

³³ Human Rights Watch (HRW), *Haiti: Criminal Violence, Hunger Trapping Children* (Oct. 9, 2024), <https://www.hrw.org/news/2024/10/09/haiti-criminal-violence-hunger-trapping-children>. See also 325-28 and associated text.

³⁴ In at least some instances, police officers operating jointly with private actors are acting outside their official capacity, while retaining the vestments of state authority. See also notes 178-98 and associated text.

³⁵ See notes 141-51 and associated text.

³⁶ See notes 574-77.

³⁷ See Section VII.

³⁸ See Jacqueline Charles, *Police, residents kill dozens of Haitian gang members after attack in Pétiön-Ville*, Miami Herald (Nov. 20, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article295784404.html> (“‘This is Ukraine, this is the front lines,’ said a prominent businessman explaining the new level of fear gripping the capital. ‘People are afraid to get out of their house because they may get a bullet.’”); Frances Robles, *Haiti: 'It's Not Back to Where We Started – It's Worse'*, NY Times (Nov. 13, 2024), <https://www.nytimes.com/2024/11/13/world/americas/haiti-gangs-airlines-doctors-without-borders.html>; UN News, *'Haitians want to be able to live, not just survive' says UN Humanitarian Coordinator* (Nov. 4, 2024), <https://news.un.org/en/interview/2024/11/1156501> (UN Resident and Humanitarian Coordinator in Haiti Ulrika Richardson said that “for the population, life is almost impossible, with the risk of being killed by stray bullets, but also of being attacked and raped”); Tom Phillips & Etienne Côté-Paluck, *'This is effectively a civil war': despair in Haiti as gangs step up assault on capital*, The Guardian (Oct. 30, 2024), <https://www.theguardian.com/world/2024/oct/30/haiti-armed-gangs-port-au-prince>; Save the Children, *Staff Account from Haiti: 'I've never felt more powerless in my own country'* (Aug. 29, 2024), <https://www.savethechildren.net/blog/haiti-staff-account-powerless-in-my-own-country>.

³⁹ The *Viv Ansanm* coalition was first formed in September 2023, and rebranded again in February 2024 to launch coordinated attacks against the government and other targets, which precipitated the resignation of *de facto* Prime Minister Ariel Henry. The coalition is made up of armed groups that continue to operate separately but come together at points for coordinated attacks. Sandra Pellegrini, *Viv Ansanm: Living together, fighting united – the alliance reshaping Haiti's gangland*, ACLED (Oct. 16, 2024), <https://acleddata.com/2024/10/16/viv-ansanm-living-together-fighting-united-the-alliance-reshaping-haitis-gangland/>. See also Evens Sanon & Dánica Coto, *Haiti's Justice Ministry warns of threats against the prime minister and his Cabinet*, AP News (Oct. 22, 2024), <https://apnews.com/article/haiti-threat-prime-minister-gang-violence-14c98b8a1f3860ff010e3bb1a30102ef>; Henriot Dorcent & Kim Ives, *Pont Sondé: Is There a Political Struggle Behind This 'Gang Massacre'?*, Orinoco Tribune (Oct. 11, 2024), <https://orinocotribune.com/pont-sonde-is-there-a-political-struggle-behind-this-gang-massacre/> (the *Gran Grif* armed group is affiliated with the *Viv Ansanm* coalition but carried out the massacre in Pont-Sondé on its own); *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 27 (noting that two of the strongest individual armed groups “in terms of territorial control, headcount, firepower and revenue” are *5 Segonn* and *Grand Ravine*, both of which are part of *Viv Ansanm*). For a deeper discussion of how the *Viv Ansanm* coalition has reshaped armed group dynamics in Haiti, see GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 2* (Nov. 2024), pp. 9-10.

⁴⁰ Reuters, *Haiti gangs push into one of few remaining capital strongholds* (Nov. 14, 2024), <https://www.reuters.com/world/americas/haiti-gangs-push-into-one-of-few-remaining-capital-strongholds-2024-11-14/>; Jean Daniel Sénat, *Fort-National: Lives Lost and Homes Burned*, Le Nouvelliste (Nov. 4, 2024), <https://lenouvelliste.com/en/article/251263/fort-national-lives-lost-and-homes-burned>; AP News, *Police in Haiti battle a gang coalition trying to seize control of the entire capital* (Oct. 21, 2024), <https://apnews.com/article/haiti-gangs-violence-solino-union-mission-c6bea0069973d723d51d23cbd9110e49>; AP News, *Another town in Haiti comes under attack a week after gangs killed at least 115 people* (Oct. 10, 2024), <https://apnews.com/article/haiti-gang-attack-arcahaie-682c8541c9fafb1f73c3172ae0ccb31>.

⁴¹ See, e.g., Press Release, UN Human Rights Office of the High Commissioner (OHCHR), *Haiti: UN Human Rights chief urges end to intensifying violence in Port-au-Prince* (Nov. 20, 2024), <https://www.ohchr.org/en/press-releases/2024/11/haiti-un-human-rights-chief-urges-end-intensifying-violence-port-au-prince> (“At least 55 percent of the deaths from simultaneous and apparently coordinated attacks in the capital [in November] arose from exchanges of fire between gang members and police.”).

⁴² See note 56.

⁴³ See note 85.

⁴⁴ HRW, *Haiti: Criminal Violence, Hunger Trapping Children* (Oct. 9, 2024). See also 325-28 and associated text.

⁴⁵ See note 535.

⁴⁶ See notes 141-51, 180-98 and associated text. For an extensive discussion for these dynamics, see Le-Cour-Grandmaison, [Haiti, caught between political paralysis and escalating violence](#) (Nov. 25, 2024).

⁴⁷ Robles, [Haiti: 'It's Not Back to Where We Started – It's Worse'](#) (Nov. 13, 2024); Phillips & Côté-Paluck, [This is effectively a civil war': despair in Haiti as gangs step up assault on capital](#) (Oct. 30, 2024); Sanon & Coto, [Haiti's Justice Ministry warns of threats against the prime minister and his Cabinet](#) (Oct. 22, 2024) (according to UN special envoy for Haiti Maria Isabel Salvador, “the situation in Haiti has regrettably worsened. . . . with renewed peaks of acute violence”).

⁴⁸ Jacqueline Charles, [More than 1,200 have been killed in Haiti as gangs launch fresh attacks](#), UN says, Miami Herald (Oct. 30, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article294774604.html>; United Nations Integrated Office in Haiti (BINUH), [Report of the Secretary-General](#), ¶ 20, UN Doc. S/2024/742 (Oct. 15, 2024), <https://documents.un.org/doc/undoc/gen/n24/282/51/pdf/n2428251.pdf>; [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 25; UN Human Rights Council (UN HRC), [Interim report of the United Nations High Commissioner for Human Rights](#), ¶ 10, UN Doc. A/HRC/57/41 (Sep. 26, 2024), <https://www.ohchr.org/en/documents/country-reports/ahrc5741-situation-human-rights-haiti-interim-report-united-nations-high> (“More than 91 per cent of all victims of killings and injuries were reported in the West Department and almost 6 per cent in the Artibonite Department.”). See also GI-TOC, [Will the Artibonite massacre be a turning point in Haiti?](#) (Oct. 9, 2024) (discussing escalating violence in the Artibonite Department since 2022).

⁴⁹ See Edxon Francisque, [Daily gunfire plagues Ouanaminthe as stray bullets hit residents inside their homes](#), Haitian Times (Nov. 11, 2024), <https://haitiantimes.com/2024/11/11/armed-gang-violence-escalates-in-haiti-northeast/>; Pellegrini, [Viv Ansanm: Living together, fighting united – the alliance reshaping Haiti's gangland](#) (Oct. 16, 2024) (“As a significant transit corridor, the Centre department has also become an increasing focus of gang activity.”).

⁵⁰ Le-Cour-Grandmaison, [Haiti, caught between political paralysis and escalating violence](#) (Nov. 25, 2024); Tom Phillips & Etienne Côté-Paluck, ['It's indescribable': the hospital on the frontline of Haiti's devastating gang war](#), The Guardian (Nov. 9, 2024), <https://www.theguardian.com/world/2024/nov/09/haiti-gang-kenyan-police-force-bloodshed>; Dánica Coto & Evens Sanon, [Haiti sees a rise in killings and police executions with children targeted](#), UN says, AP News (Oct. 30, 2024), <https://apnews.com/article/haiti-police-gang-violence-un-mission-63fbb5f85019668f793e80069b8f0558>; [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 25. See also GI-TOC, [Observatory of Violence and Resilience in Haiti: Issue 2](#) (Nov. 2024), p. 2 (“more than 80%”); Al Jazeera, [At least 150 people killed over past week in Haiti's Port-au-Prince: UN](#) (Nov. 2, 2024), <https://www.aljazeera.com/news/2024/11/20/at-least-150-people-killed-over-past-week-in-haitis-port-au-prince-un> (“at least 80%”); Edith M. Lederer, [Haitian gangs escalate violence and expand attacks outside the capital, top UN official says](#), AP News (Oct. 22, 2024), <https://apnews.com/article/un-haiti-gangs-violence-escalate-food-attacks-a531646bc9744fc6f68afa5f4485c9ad> (80%); Michael Wilner & Jacqueline Charles, [Top Democrats ask Biden for resources against arms trafficking from Florida to Haiti](#), Miami Herald (Sep. 26, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article293073884.html> (“more than 85%”).

⁵¹ Press Release, OHCHR, [Haiti: UN Human Rights chief urges end to intensifying violence in Port-au-Prince](#) (Nov. 20, 2024) (“In a night-time attack on 18 November, gang members attempted to take control of the Pétion-Ville suburb, one of the last few districts of the capital not controlled by gangs.”); Francisque, [Daily gunfire plagues Ouanaminthe as stray bullets hit residents inside their homes](#) (Nov. 11, 2024); Pierre-Richard Luxama & Evens Sanon, [Gang coalition in Haiti spreads violence to Port-au-Prince neighborhood, setting fire to homes](#), AP News (Oct. 26, 2024), <https://apnews.com/article/haiti-gang-violence-solino-portauprince-viv-ansam-e1a44e2ae68a1195d65e7ae4a4b81c1b> (in October, the Viv Ansanm coalition “reinforced its attacks on [Solino,] one of the few communities in the Haitian capital not under the control of criminal groups, seeking to take it over.”); Lederer, [Haitian gangs escalate violence and expand attacks outside the capital, top UN official says](#) (Oct. 22, 2024); AP News, [Police in Haiti battle a gang coalition trying to seize control of the entire capital](#) (Oct. 21, 2024) (reporting on an escalation of violence in October in certain Port-au-Prince neighborhoods not already under the control of armed groups); BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶¶ 20, 45 (armed groups have “spread from the capital to various departments of the country,” including communes east and north of Port-au-Prince, with “police reports of gang members from Port-au-Prince relocating to the South-East, South and Grand-Anse Departments”); [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 39 (the *Gran Grif* armed group has expanded its reach to the northern communes of the Artibonite Department, which had previously been spared from violence). See also Le-Cour-Grandmaison, [Haiti, caught between political paralysis and escalating violence](#) (Nov. 25, 2024) (“Gang shootouts just metres from the residences of ambassadors and ministers, and the offices of international organizations show the gangs can attack wherever they please.”); UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶¶ 7, 8 (attributing expansion by armed groups to “the flight of residents from southern zones, where gang activities had become pervasive, thereby limiting the opportunities for gangs to generate illicit income through kidnapping, extortion and robbery”).

⁵² Frances Robles, [At Least 70 People Dead in Gang Attack in Haiti](#), NY Times (Oct. 4, 2024), <https://www.nytimes.com/2024/10/04/us/haiti-gang-attack.html> (“Criminal groups are in a desperate and violent quest to control all of the country’s major highways, ports and the coastline.”). See also notes 78-80, 355 and associated text.

⁵³ Le-Cour-Grandmaison, [Haiti, caught between political paralysis and escalating violence](#) (Nov. 25, 2024); GI-TOC, [Observatory of Violence and Resilience in Haiti: Issue 2](#) (Nov. 2024), pp. 1, 7-8; UNSC, [Report of the UN Office on Drugs and Crime](#), ¶ 7, UN Doc. S/2024/752 (Oct. 16, 2024), <https://documents.un.org/doc/undoc/gen/n24/285/16/pdf/n2428516.pdf> (“A consequence of the deployment of the Multinational Security Support mission appears to be the displacement or “ballooning” of gangs to other areas of Haiti.”); BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶¶ 41, 43; [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶¶ 25, 29-30, 33-36, 44, 142, 156-58; UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 6.

⁵⁴ Operations at the seaport were forced to shut down from September 11 until October 12. Roberson Alphonse, *Ships Arrive at the Port of Port-au-Prince*, Le Nouvelliste (Oct. 14), <https://lenouvelliste.com/en/article/250880/ships-arrive-at-the-port-of-port-au-prince>; Marine Insight, *Armed Gangs Attack Haiti's Main Port, Blocking City's Access To Vital Supplies* (Sep. 27, 2024), <https://www.marineinsight.com/shipping-news/armed-gangs-attack-haitis-main-port-blocking-citys-access-to-vital-supplies/> (“[O]ver a dozen gang members attacked the main port terminal, APN, looting containers, damaging security infrastructure and forcing operations in the port to stop.”); Reuters, *Haiti key port closed to land access after gang attacks* (Sep. 26, 2024), <https://www.reuters.com/markets/commodities/haiti-key-port-closed-land-access-after-gang-attacks-2024-09-26/> (“[S]hips were being shot at, preventing them from docking and unloading containers, while authorities have reported the kidnapping of two Filipino crew members from a cargo vessel in the port.”).

⁵⁵ The airport shut down on November 12, and will remain closed until at least December 11. Crisis 24, *Haiti: Authorities extend closure of Port-au-Prince's Toussaint Louverture International Airport (PAP) through at least Dec. 11* (Dec. 3, 2024), <https://crisis24.garda.com/alerts/2024/12/haiti-authorities-extend-closure-of-port-au-princes-toussaint-louverture-international-airport-pap-through-at-least-dec-11-update-2> (also reporting that “the US government has prohibited US-flagged aircraft from operating out of PAP [Port-au-Prince] through at least Dec. 12”); Al Jazeera, *Haiti could be ‘completely isolated’ as gunfire closes main airport again* (Nov. 12, 2024), <https://www.aljazeera.com/news/2024/11/12/haiti-completely-isolated-gunfire-closes-main-airport-again>.

Several airlines have independently suspended operations as a result. Le Nouvelliste, *Air Transat Suspends Flights to Haiti Through January 15* (Nov. 15, 2024), <https://lenouvelliste.com/en/article/251480/air-transat-suspends-flights-to-haiti-through-january-15>; Jacqueline Charles, *FAA bans U.S. airlines from flying to Haiti for 30 days after gunfire hit Spirit, JetBlue, American*, Miami Herald (Nov. 12, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article295443354.html> (American Airlines canceled all flights to Haiti until February 2025); Jean Daniel Sénat, *Port-au-Prince Isolated from the World Again Due to Gang Violence*, Le Nouvelliste (Nov. 11, 2024), <https://lenouvelliste.com/en/article/251391/port-au-prince-isolated-from-the-world-again-due-to-gang-violence> (“The local airline Sunrise Airways, which connects Port-au-Prince to Les Cayes, Cap Haitien, and several cities in the Caribbean, has also announced the suspension of its operations in Port-au-Prince.”).

⁵⁶ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 114 (reporting 3,638 homicides between January and June); BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 24 (reporting 1,441 homicides between June and August). See also Press Release, OHCHR, *Haiti: UN Human Rights chief urges end to intensifying violence in Port-au-Prince* (Nov. 20, 2024) (reporting 4,544 dead between January and November, but noting that “[t]he real toll is likely higher still”).

⁵⁷ BINUH, *Report of the Secretary-General*, ¶ 11, UN Doc. S/2024/62 (Jan. 15, 2024), https://binuh.unmissions.org/sites/default/files/report_of_the_un_secretary_general_on_haiti_binuh_-_15_january_2024.pdf (reporting 4,789 deaths in all of 2023). See also BINUH, *Report of the Secretary-General*, ¶ 16, UN Doc. S/2024/508 (Jun. 27, 2024), https://binuh.unmissions.org/sites/default/files/report_of_the_un_secretary-general_on_the_situation_in_haiti_on_binuh_july_3rd_2024.pdf (the number of intentional homicides from January to May 2024 recorded by BINUH (3,252) increased by over 30% from the previous five-month period (2,453)); Daniela Mohor, Stanley Jérôme & Nyaboga Kiage, *Haiti in-depth: Ten key questions as Kenyan police deploy to restore order*, The New Humanitarian (Jun. 26, 2024), <https://www.thenewhumanitarian.org/analysis/2024/06/26/haiti-ten-key-questions-kenyan-police-deployment> (“During the first three months of the year, 1,660 people were killed and 845 injured, a record high since the UN started monitoring human rights in Haiti in early 2022, and 53% more than the last three months of last year.”).

⁵⁸ See, e.g., Charles, *Police, residents kill dozens of Haitian gang members after attack in Pétiion-Ville* (Nov. 20, 2024); AP News, *Another town in Haiti comes under attack a week after gangs killed at least 115 people* (Oct. 10, 2024); UN Populations Fund (UNFPA), *Haiti Situation Report #6 – 19 August 2024* (Aug. 2024), <https://www.unfpa.org/resources/haiti-situation-report-6-19-august-2024> (large-scale attacks in the commune of Ganthier, east of Port-au-Prince, in August displaced over 6,000 people); Juhakenson Blaise, *Over 25 killed and many kidnapped by gangs in Gressier, Haiti*, Haitian Times (Jul. 2, 2024), <https://haitiantimes.com/2024/07/02/gressier-haiti-gang-attack/>.

⁵⁹ Pont-Sondé is a commercial hub in the Artibonite Department. AP News, *Another town in Haiti comes under attack a week after gangs killed at least 115 people* (Oct. 10, 2024); Evens Sanon & Pierre-Richard Luxama, *The death toll in a gang attack on a Haitian town rises to at least 115*, AP News (Oct. 9, 2024), <https://apnews.com/article/haiti-gang-attack-pontsonde-gran-grif-1a45faafb929a605f30af4efd8454aeb> (“The victims included babies, young mothers and the elderly, with the gang approaching Pont-Sondé via canoes to catch residents by surprise. . . . Survivors have questioned why authorities did not do anything to stop the attack since the gang had warned in a video posted on social media that it planned to target Pont-Sondé.”); Robles, *At Least 70 People Dead in Gang Attack in Haiti* (Oct. 4, 2024) (armed groups set houses on fire and shot people attempting to flee, with reports that “[e]ntire families were wiped out”); Juhakenson Blaise, *Gran Grif gang killed numerous people in an attack at Haiti's Pont-Sondé, official reports*, Haitian Times (Oct. 4, 2024), <https://haitiantimes.com/2024/10/03/gran-grif-gang-attack-pont-sonde/> (“Survivors recounted being dragged from their homes in the early morning hours and marched to the gang’s base in Savien, where many were executed.”). See generally ECCREDHH, *Rapport sur le Massacre à Pont-Sondé, ECCREDHH accuse le Gouvernement Conille et le Haut Commandement de la Police Nationale d’Haïti (PNH)* (Oct. 7, 2024); Fondasyon Je Klere (FJKL), *Massacre de Pont Sondé : A qui la faute ? La FJKL s’interroge* (Oct. 2024); RNDDH, *Massacre at Pont-Sondé : National Human Rights Defense Network (RNDDH) Demands Immediate Protection of the Population from State Authorities* (Oct. 4, 2024), https://web.rnddh.org/wp-content/uploads/2024/10/2-CP-Pont-Sonde-massacre-press-release-4October2024.ENG_.pdf. See also note 138 and associated text.

⁶⁰ Most assessments have reported a much higher death toll, anywhere from 70 to 115. See, e.g., ECCREDHH, *Rapport sur le Massacre à Pont-Sondé, ECCREDHH accuse le Gouvernement Conille et le Haut Commandement de la Police Nationale d’Haïti (PNH)* (Oct. 7, 2024), pp. 1-2 (reporting at least 70); RNDDH, *Massacre at Pont-Sondé : National Human Rights Defense Network (RNDDH) Demands Immediate Protection of the Population from State Authorities* (Oct. 4, 2024), ¶ 6 (reporting over 70); FJKL, *Massacre de Pont Sondé : A qui la faute ? La FJKL s’interroge* (Oct. 2024), ¶ 40 (reporting 90 to 100); GI-TOC,

Observatory of Violence and Resilience in Haiti: Issue 2 (Nov. 2024), p. 7 (reporting the death toll at 109); Sanon & Luxama, *The death toll in a gang attack on a Haitian town rises to at least 115* (Oct. 9, 2024) (reporting 115 and noting that the number “would likely keep rising because authorities are still looking for bodies and haven’t been able to access certain areas of the town”). Conservatively, the death toll has been estimated at 50. Louis Chadrac, *Pont Sondé Massacre: Conflicting Death Toll Reports*, *Le Nouvelliste* (Oct. 22, 2024) <https://lenouvelliste.com/en/article/251036/pont-sonde-massacre-conflicting-death-toll-reports> (suggesting that the death toll reported in the media may be exaggerated).

⁶¹ Charles, *Police, residents kill dozens of Haitian gang members after attack in Pétion-Ville* (Nov. 20, 2024); Pierre-Richard Luxama & Evens Sanon, *Masses of Haitians flee homes in the capital as gang violence explodes amid political turmoil*, PBS (Nov. 14, 2024), <https://www.pbs.org/newshour/world/masses-of-haitians-flee-homes-in-the-capital-as-gang-violence-explodes-amid-political-turmoil> (“The United Nations said that it documented 20 armed clashes in Port-au-Prince in just one day.”); Sénat, *Fort-National: Lives Lost and Homes Burned* (Nov. 4, 2024).

⁶² IOM, *Over 40,000 people displaced in 10 days in Port-au-Prince as violence surges* (Nov. 26, 2024), <https://lac.iom.int/en/news/over-40000-people-displaced-10-days-port-au-prince-violence-surges>; Le-Cour-Grandmaison, *Haiti, caught between political paralysis and escalating violence* (Nov. 25, 2024) (this was “the largest forced displacement since UN Migration began tracking data in the country”); International Organization for Migration (IOM), *Haiti — Emergency Tracking Tool 52.2 — Updates on Displacement following attacks in the Metropolitan Area of Port-au-Prince* (Nov. 11-20, 2024), <https://dtm.iom.int/reports/haiti-emergency-tracking-tool-522-updates-displacement-following-attacks-metropolitan-area>; Al Jazeera, *At least 150 people killed over past week in Haiti’s Port-au-Prince: UN* (Nov. 2, 2024). See also Press Release, OHCHR, *Haiti: UN Human Rights chief urges end to intensifying violence in Port-au-Prince* (Nov. 20, 2024) (“At least 55 percent of the deaths from simultaneous and apparently coordinated attacks in the capital arose from exchanges of fire between gang members and police.”); Charles, *Police, residents kill dozens of Haitian gang members after attack in Pétion-Ville* (Nov. 20, 2024) (reporting that the attack prompted a strong response from civilian self-defense movements in the area, who retaliated against the armed groups and left “[c]orpses, cut apart with machetes and set on fire . . . strewn on the road”). See also note 145.

⁶³ GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 2* (Nov. 2024), p. 10 (“[V]iolence is used to enforce discipline and order. . . [and] as a deterrent, creating an atmosphere of fear and unpredictability. Public displays of violence, such as massacres and the mutilation of bodies, are particularly effective in enforcing control.”); BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 42 (“In communes tightly controlled by gangs, such as Carrefour, Cité Soleil and Gressier, gang members showed extreme brutality against their victims.”); *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶¶ 35, 44 (reporting on armed groups’ use of arson and mass murder as they sought to take control of the communes of Arcahaïe, Cabaret, and Gressier); Jacqueline Charles, *What a gang attack in a rural Haiti town says about the Kenya-led security mission*, *Miami Herald* (Jul. 26, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article290431544.html> (reporting on violence by the 400 *Mawozo* armed group in its effort to take control of Ganthier and neighboring Fond-Parisien, which “would allow gangs to spread their violence eastward all the way to the Malpasse border crossing with the Dominican Republic”).

⁶⁴ Global Centre for the Responsibility to Protect, *Haiti* (Dec. 1, 2024), <https://www.globalr2p.org/countries/haiti/>; Michael Crowley, *Blinked Visits a Haiti Wracked by Corruption and Gangs*, *NY Times* (Sep. 5, 2024), <https://www.nytimes.com/2024/09/05/us/politics/blinken-haiti-gang-violence.html>; David C. Adams & Andre Paultre, *Sidestepping Deployed Kenyan Forces, Haiti Gangs Continue Reign of Terror*, *NY Times* (Aug. 11, 2024), <https://www.nytimes.com/2024/08/11/world/americas/haiti-gangs-kenya-police.html>.

⁶⁵ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶¶ 39, 42; *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 40; UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶¶ 6, 11.

⁶⁶ Francisque, *Daily gunfire plagues Ouanaminthe as stray bullets hit residents inside their homes* (Nov. 11, 2024); Jean Daniel Sénat, *Gangs Launch New Attack in Port-au-Prince*, *Le Nouvelliste* (Oct. 18, 2024), <https://lenouvelliste.com/en/article/250967/gangs-launch-new-attack-in-port-au-prince> (reporting that “[a] young girl was shot in the head and killed while watching TV” during an armed group attack on the Solino and Delmas 24 neighborhoods); BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶¶ 40, 45; Robles, *At Least 70 People Dead in Gang Attack in Haiti* (Oct. 4, 2024); *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 40; UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 11 (“While some victims were struck by random gunfire on their way to work, using public transport, or simply in their homes, others were executed in broad daylight for allegedly informing the police or authorities, or for opposing the activities of gangs.”); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 35.

⁶⁷ @nouvelliste, X (Nov. 19, 2024), <https://x.com/nouvelliste/status/1858870871655379133> (describing the ground in Pétion-Ville as “littered” with burned corpses after an armed group attack in November); Sénat, *Fort-National: Lives Lost and Homes Burned* (Nov. 4, 2024) (some have died when members of armed groups set their houses on fire); BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 42 (reporting that a police officer was mutilated, then burned alive); RNDDH, *Murders, Rapes, Looting, and Arson in Carrefour and Gressier Under the Indifferent Gaze of the New State Authorities*, ¶¶ 43, 54, 56, 60 (Aug. 15, 2024), <https://web.rnddh.org/wp-content/uploads/2024/09/6-Rap-Carrefour-Gressier-15Aout2024.ENG.pdf>; UN General Assembly (UNGA), *Report of the Secretary-General on Children and armed conflict*, ¶ 73, UN Doc. A/78/842-S/2024-384 (Jun. 3, 2024), <https://documents.un.org/doc/undoc/gen/n24/095/07/pdf/n2409507.pdf> (reporting that armed groups burned children alive as part of reprisals).

⁶⁸ Tactics include offering cash handouts to residents to ensure they stay in their homes, occupying houses and preventing residents from evacuating (summarily killing those who try to escape), or calling displaced residents to return to neighborhoods under the false pretense that they are now safe. *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶¶ 46, 136-38 (“This strategy could allow gangs to blend in with civilians during operations by the Haitian national police and potentially the Multinational Security Support mission, thus increasing the risk of civilian casualties, especially in densely populated areas.”).

⁶⁹ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶¶ 39-40, 44 (between June and October, armed groups looted and/or set on fire at least 514 residences and other private buildings); BINUH, [Quarterly report on the human rights situation in Haiti](#), p. 9 (April-June 2024), https://binuh.unmissions.org/sites/default/files/quarterly_report_on_the_human_rights_situation_in_haiti.pdf (between April and June, armed groups “destroyed or set fire to over 450 homes and businesses, notably in the Solino neighborhood of Port-au-Prince and other areas in Delmas, Gressier and Tabarre”); @Jacquiecharles, X (Nov. 12, 2024), <https://x.com/Jacquiecharles/status/1856303777705349247> (armed groups burned an orphanage in Fond Parisien); Jacqueline Charles, *Armed gangs in Haiti target U.S. Embassy vehicles, UN chopper in escalation of attacks*, Miami Herald (Oct. 24, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article294472979.html>; Sénat, [Gangs Launch New Attack in Port-au-Prince](#) (Oct. 18, 2024); Robles, [At Least 70 People Dead in Gang Attack in Haiti](#) (Oct. 4, 2024) (armed group members reportedly set fire to at least 45 houses and 34 vehicles during the Pont-Sondé massacre); RNDDH, [Murders, Rapes, Looting, and Arson in Carrefour and Gressier Under the Indifferent Gaze of the New State Authorities](#) (Aug. 15, 2024), ¶¶ 93, 110 (“From January to July 2024, hundreds of houses were looted, burned, or squatted by armed gang members.”); Juhakenson Blaise, *Gang attack in Haiti’s Ganthier leaves at least 2 deaths and many missing*, Haitian Times (Jul. 22, 2024), <https://haitiantimes.com/2024/07/22/two-deaths-in-an-attack-in-the-town-of-ganthier-haiti/> (the 400 Mawozo armed group set fire to numerous homes, as well as the police station and customs control center, in Ganthier); Jonasson Odigène, *Croix-des-Bouquets: ‘400 Mawozo’ Gang Strongly Barricades National Road #8*, Le Nouvelliste (Jul. 9, 2024), <https://lenouvelliste.com/en/article/249050/croix-des-bouquets-400-mawozo-gang-strongly-barricades-national-road-8> (“bandits systematically vandalized and set fire to the main state and private institutions in [Croix-des-Bouquets],” including the city hall); BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 35.

⁷⁰ See notes 281-96 and associated text.

⁷¹ UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 11.

⁷² UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 11.

⁷³ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 42 (“In communes tightly controlled by gangs. . . . entire families were executed inside their homes for alleged collaboration with the police.”); UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 6, 11.

⁷⁴ For example, Pont-Sondé massacre was perpetrated in retaliation against residents for collaborating with a local self-defense group that was attempting to resist an illegal toll set up by the *Gran Griff* armed group on the national highway. GI-TOC, [Will the Artibonite massacre be a turning point in Haiti?](#) (Oct. 9, 2024); RNDDH, [Massacre at Pont-Sondé: National Human Rights Defense Network \(RNDDH\) Demands Immediate Protection of the Population from State Authorities](#) (Oct. 4, 2024), ¶ 3; FJKL, *Massacre de Pont Sondé: A qui la faute? La FJKL s’interroge* (Oct. 2024), ¶¶ 6-32.

⁷⁵ Press Release, OHCHR, [Haiti: UN Human Rights chief urges end to intensifying violence in Port-au-Prince](#) (Nov. 20, 2024) (armed groups now control all main roads leading in and out of Port-au-Prince); Amy Wilentz, *JD Vance’s Slanders Are Far From the Worst Thing the US Has Done to Haitians*, The Nation (Sep. 11, 2024), <https://www.thenation.com/article/world/vance-blinken-haiti-us-aid/> (“The highways around the country are places of banditry and death where hardly anyone ventures.”).

⁷⁶ See notes 54-55.

⁷⁷ GI-TOC, [Observatory of Violence and Resilience in Haiti: Issue 2](#) (Nov. 2024), p. 2; Jean Feguens Regala, *The Road to Seguin: Trading Gang Violence for Other Dangers*, Ayibo Post (Aug. 28, 2024), <https://ayibopost.com/the-road-to-seguin-trading-gang-violence-for-other-dangers-photos/>. See also @Radio_Metronome, X (Aug. 27, 2024), https://x.com/Radio_Metronome/status/1828379013204557909 (despite the difficulty and danger of traveling in Haiti “the authorities have taken no corrective measures and prefer to use the air route to travel to the Artibonite and the North”).

⁷⁸ Adams & Paultre, [Sidestepping Deployed Kenyan Forces, Haiti Gangs Continue Reign of Terror](#) (Aug. 11, 2024). See also GI-TOC, [Observatory of Violence and Resilience in Haiti: Issue 2](#) (Nov. 2024), p. 1 (“[T]he total closure of the Gressier area, a unique gateway to the south, has isolated a third of the country, which now depends on coastal shipping for its supplies.”).

⁷⁹ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 43 (“Several gang roadblocks have been established alongside roads in Carrefour, Cité Soleil, Delmas, Gressier and Port-au-Prince, where drivers, passengers and passersby are at high risk of being extorted, raped, kidnapped or killed.”); UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 18. See also note 355.

⁸⁰ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶¶ 42, 45; FJKL, *Massacre de Pont Sondé: A qui la faute? La FJKL s’interroge* (Oct. 2024), ¶¶ 6-32.

⁸¹ GI-TOC, [Observatory of Violence and Resilience in Haiti: Issue 2](#) (Nov. 2024), p. 9; Juhakenson Blaise, *Gangs continue to rule and expand their grip on Haiti as authorities promise action*, Haitian Times (Aug. 26, 2024), <https://haitiantimes.com/2024/08/26/gangs-continue-to-rule-haiti/>; GI-TOC, [Observatory of Violence and Resilience in Haiti: Issue 1](#), p. 4 (Jul. 2024), <https://riskbulletins.globalinitiative.net/download/ht-obs-001-screen-pdf.pdf>.

⁸² Note that different armed groups have different relationships to civilians in territories under their control, with some more tyrannical than others. GI-TOC, [Observatory of Violence and Resilience in Haiti: Issue 1](#) (Jul. 2024), pp. 4, 6 (“By distributing food or petty cash, or providing work and social recognition to children enrolled as foot soldiers, the gangs seek to consolidate their legitimacy. This involved promising to protect the population from attacks by the police, or the MSS mission; they capitalize on their closeness to the people, in contrast to their abandonment by the state.”). See also BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 43 (armed groups claim “the roles of the police and the courts,” and “[i]ndividuals accused by gangs of theft or other acts carried out without their consent have been beaten, held captive or killed”); [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 153 (the 5 *Segond* armed group reportedly distributed food it had looted from a ship

to residents in its territorial stronghold for free or at half-price “as a ‘goodwill’ gesture to please the community,” while still making a profit because “the gang gets the commodities for ‘free’”).

⁸³ [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 26 (“The lives of the inhabitants of the entire capital have been deeply affected by gang violence, hampering the functioning of vital sectors, including security, education, health, culture and transport.”); GI-TOC, [Observatory of Violence and Resilience in Haiti: Issue 2](#) (Nov. 2024), p. 10 (although residents of Cité Soleil reported in September that the area has been relatively calm since July, “residents still lack humanitarian access and resources, such as safe drinking water and food, which can only be found outside the community”); Mamyrah Prosper et al., *Haiti’s Gang Violence Is a Symptom of Its Political Crisis*, Jacobin (Aug. 14, 2024), <https://jacobin.com/2024/08/haiti-gang-violence-political-crisis>. See also Section VI.

⁸⁴ [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 119.

⁸⁵ IOM, *Haiti — Report on the internal displacement situation in Haiti — Round 8* (Sep. 2024), <https://dtm.iom.int/reports/haiti-report-internal-displacement-situation-haiti-round-8-september-2024>. Compare with BINUH, *Report of the Secretary-General*, ¶ 62, UN Doc. S/2024/310 (Apr. 16, 2024), https://binuh.unmissions.org/sites/default/files/sgs_report_on_binuh_-_16_april_2024.pdf (reporting 362,551 displaced in April).

⁸⁶ Many of those displaced in November had already been displaced prior to the most recent attacks, making it difficult to determine how this number impacts the total number of IDPs in Haiti. IOM, [Haiti — Emergency Tracking Tool 52.2 — Updates on Displacement following attacks in the Metropolitan Area of Port-au-Prince](#) (Nov. 11-20, 2024).

⁸⁷ IOM, *Haiti — Report on the internal displacement situation in Haiti — Round 8* (Sep. 2024), p. 5. But see Rolph Louis-Jeune, *La Gônave: A risky journey for families forced to flee to Arcahaie due to insecurity*, Ayibo Post (Nov. 18, 2024), <https://ayibopost.com/la-gonave-a-risky-journey-for-families-forced-to-flee-to-arcahaie-due-to-insecurity/> (over 1,500 people fled from Arcahaie (near Port-au-Prince) to La Gônâves, an island in the West Department, in October, undergoing a dangerous journey in overloaded boats – that are themselves at risk of attack by armed groups – to get there).

⁸⁸ IOM, *Haiti — Report on the internal displacement situation in Haiti — Round 8* (Sep. 2024), p. 5 (45% have fled to the Great South); Jacqueline Charles, *This seaside Haiti town used to draw tourists. Now it draws refugees from gangs*, Miami Herald (Sep. 24, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article291515080.html> (“In recent months, more than 60,000 refugees have fled to the southeast, half of them settling in its capital of Jacmel.”).

⁸⁹ IOM, *Haiti — Report on the internal displacement situation in Haiti — Round 8* (Sep. 2024), p. 5 (98%).

⁹⁰ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 63; IOM, *Over 700,000 Displaced in Haiti, Half are Children as Humanitarian Crisis Worsens* (Oct. 2, 2024), <https://www.iom.int/news/over-700000-displaced-haiti-half-are-children-humanitarian-crisis-worsens>; Charles, *This seaside Haiti town used to draw tourists. Now it draws refugees from gangs*, (Sep. 24, 2024); UN News, *‘Entire social fabric’ unravelling in Haiti as displacement continues* (Jul. 20, 2024), <https://news.un.org/en/story/2024/07/1152336>; Edxon Francisque, *Haiti’s northeast sees new challenges and opportunities as displaced residents settle in*, Haitian Times (Jul. 3, 2024), <https://haitiantimes.com/2024/07/03/haiti-internal-migration-displacement-provinces/>; BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 53; Lucnise Duquereste & Jabin Phontus, *Schools in rural areas overwhelmed by influx of students from P-au-P*, Ayibo Post (Jun. 21, 2024), <https://ayibopost.com/schools-in-rural-areas-overwhelmed-by-influx-of-students-from-p-au-p/>; IOM, *Haiti — Report on the internal displacement situation in Haiti — Round 7*, p. 3 (Jun. 2024), <https://dtm.iom.int/reports/haiti-report-internal-displacement-situation-haiti-round-7-june-2024?close=true> (“[A]t the beginning of the crisis, the majority of IDPs in the MAPAP were hosted by host families: only about 2 out of 10 IDPs were in sites in 2022; this figure increased to 6 out of 10 IDPs in 2023. One of the main reasons for this increase was the lack of resources of host communities to continue hosting IDPs and the deterioration of social cohesion in this context.”); IOM, *Haiti — Summary of results from assessment of suicidal behavior in the Metropolitan Area of Port-au-Prince and recommendations for suicide prevention*, p. 4 (Mar. 2024), <https://dtm.iom.int/reports/haiti-summary-results-assessment-suicidal-behavior-metropolitan-area-port-au-prince-and-recommendations-for-suicide-prevention> (IDPs have been met with verbal or physical aggression in some host communities). See generally IOM, *Haiti — Displacement dynamics in Haiti — Understanding the relationships between IDPs and their host communities, impact of IDPs’ arrival on these communities, the displacement history of IDPs and their return intentions* (Sep. 2024), <https://dtm.iom.int/reports/haiti-displacement-dynamics-haiti-understanding-relationships-between-idps-and-their-host>.

⁹¹ Widlore Mérancourt & Amanda Coletta, *As Haitians flee the capital, dear rise that the gangs will follow*, Washington Post (Sep. 1, 2024), <https://www.washingtonpost.com/world/2024/09/01/haiti-internally-displaced-people-gang-violence/>; IOM, *Haiti — Summary of results from assessment of suicidal behavior in the Metropolitan Area of Port-au-Prince and recommendations for suicide prevention* (Mar. 2024), p. 4.

⁹² IOM, *Haiti — Report on the internal displacement situation in Haiti — Round 8* (Sep. 2024), pp. 5, 10 (reporting 95 sites, and explaining that “[t]he growing insecurity restricting possibilities to seek refuge with relatives, the lack of resources of host families to accommodate IDPs for a relatively long period of time, and the deterioration of social cohesion, are the main reasons for this”); IOM, [Haiti — Emergency Tracking Tool 52.2 — Updates on Displacement following attacks in the Metropolitan Area of Port-au-Prince](#) (Nov. 11-20, 2024) (21 sites were emptied after armed group attacks in November, while 19 new sites were created).

⁹³ Fenel Péliissier & Rolph Louis-Jeune, *The humanitarian crisis is worsening in Haiti*, Ayibo Post (Nov. 26, 2024), <https://ayibopost.com/the-humanitarian-crisis-is-worsening-in-haiti/>; IOM, *Haiti — Report on the internal displacement situation in Haiti — Round 8* (Sep. 2024), p. 12; UN Office for the Coordination of Humanitarian Affairs (OCHA), *Haiti — Advocacy note for the immediate mobilization of resources, August 2024*, p. 6 (Aug. 21, 2024), <https://reliefweb.int/report/haiti/haiti-advocacy-note-immediate-mobilisation-resources-august-2024>; Elien Pierre, *Painful Living Situation: Homeless in a Fish Market*, Le Nouvelliste (Jul. 29, 2024), <https://lenouvelliste.com/en/article/249339/painful-living-situation-homeless-in-a-fish-market>.

⁹⁴ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 62.

⁹⁵ UN News, *Haiti faces record displacement amid escalating gang violence* (Jun. 20, 2024), <https://news.un.org/en/story/2024/06/1151306>; Global Protection Cluster, *Protection of internally displaced persons in Haiti*, p. 4 (May 2024), https://globalprotectioncluster.org/sites/default/files/2024-05/protection_of_internally_displaced_people_in_haiti_eng.pdf (“75% of IDP sites are located in areas controlled by gangs or in high-risk zones where gang activity is prevalent. . . . In recent weeks, the protection cluster has documented several deadly incursions by gangs into the sites, as well as incidents where IDPs have been killed or injured during shootouts between gangs and the police.”). See also note 92.

⁹⁶ IOM, *Haiti — Summary of results from assessment of suicidal behavior in the Metropolitan Area of Port-au-Prince and recommendations for suicide prevention* (Mar. 2024), p. 3; Global Protection Cluster, *Protection of internally displaced persons in Haiti* (May 2024), p. 5 (“Many IDP sites are located on private properties owned by religious congregations, in schools, or public buildings. This situation places them at high risk of eviction. Since January 2024, the protection cluster has recorded at least 23 site evictions.”). See also UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 22.

⁹⁷ Vant Bèf Info, *Une distribution au Lycée Marie-Jeanne vire au drame: une femme tuée par balle* (Oct. 15, 2024), <https://vantbefinfo.com/une-distribution-au-lycee-marie-jeanne-vire-au-drame-une-femme-tuee-par-balle/>; UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 22 (“Several deadly incursions by gangs into those [displacement] sites have been documented, as well as incidents in which internally displaced persons have been killed or injured during shootouts between gangs and the police.”); Réseau pour l’Égalité de Genre dans l’Action Humanitaire (REGAH HAITI), IDEJEN & UN Women, *Addressing Haitian women’s particular needs through their leadership role*, ¶ 1 (Jul. 2024), <https://www.unwomen.org/sites/default/files/2024-07/Addressing-Haitian-womens-particular-needs-through-their-leadership-role-en.pdf> (describing the “constant risk of stray bullets”); Global Protection Cluster, *Protection of internally displaced persons in Haiti* (May 2024), pp. 4-5 (reporting that armed groups have also used IDPs as human shields during attacks). See also Jonasson Odigène, *Port-au-Prince Concludes a Week of Intense Tension*, Le Nouvelliste (Nov. 15, 2024), <https://lenouvelliste.com/en/article/251476/port-au-prince-concludes-a-week-of-intense-tension> (reporting that some IDPs have armed themselves with machetes while waiting for armed group attacks nearby to subside).

⁹⁸ See BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 53 (over half of IDPs have been displaced more than once); Odigène, *Port-au-Prince Concludes a Week of Intense Tension* (Nov. 15, 2024).

⁹⁹ Phillips & Côté-Paluck, *‘This is effectively a civil war’: despair in Haiti as gangs step up assault on capital* (Oct. 30, 2024) (describing “hundreds of destitute families squat[ing] in nine classrooms”); IOM, *Over 700,000 Displaced in Haiti, Half are Children as Humanitarian Crisis Worsens* (Oct. 2, 2024); AFP, *“J’aimerais rentrer chez moi”: en Haïti, la détresse des déplacés internes*, Le Nouvelliste (Jul. 13, 2024), <https://lenouvelliste.com/article/249124/jaimerais-rentre-chez-moi-en-haiti-la-detresse-des-deplaces-internes> (describing cramped conditions in a church, where 800 people have taken refuge); UN News, *Haiti faces record displacement amid escalating gang violence* (Jun. 20, 2024).

¹⁰⁰ Péliissier & Louis-Jeune, *The humanitarian crisis is worsening in Haiti* (Nov. 26, 2024); Louis-Jeune, *La Gônave: A risky journey for families forced to flee to Arcahaie due to insecurity* (Nov. 18, 2024); IOM, *Over 700,000 Displaced in Haiti, Half are Children as Humanitarian Crisis Worsens* (Oct. 2, 2024); Médecins Sans Frontières (MSF), *Haiti: People fleeing violence in capital urgently need water and sanitation* (Aug. 15, 2024), <https://www.doctorswithoutborders.ca/haiti-people-fleeing-violence-in-capital-urgently-need-water-and-sanitation/>; UNHCR, *Haiti Factsheet* (Jul. 2024), <https://reporting.unhcr.org/haiti-factsheet-8986> (“31% of [displacement] sites have no latrines”); Germina Pierre Louis, *Conditions sanitaires alarmantes pour les déplacés internes logés au local du MENFP*, Le Nouvelliste (Jul. 25, 2024), <https://lenouvelliste.com/article/249276/conditions-sanitaires-alarmantes-pour-les-deplaces-internes-loges-au-local-du-menfp> (IDPs in one site are forced to pay to use toilets and showers that are not functional anyway); RFI, *Haiti church takes in hundreds fleeing gang violence* (Jul. 13, 2024), <https://www.rfi.fr/en/international-news/20240713-haiti-church-takes-in-hundreds-fleeing-gang-violence>; REGAH HAITI, IDEJEN & UN Women, *Addressing Haitian women’s particular needs through their leadership role* (Jul. 2024), ¶ 5 (“Before fleeing their homes, 66.2 per cent of IDPs surveyed said they had access to health services through a health center or hospital close to their neighborhoods, but only 10.3 per cent of women and 32 per cent of men had access in IDP sites.”); UN News, *Haiti faces record displacement amid escalating gang violence* (Jun. 20, 2024); IOM, *Haiti — Report on the internal displacement situation in Haiti — Round 7* (Jun. 2024), p. 11.

¹⁰¹ World Food Programme (WFP), *Hunger in Haiti reaches historic high with one-in-two Haitians now in acute hunger* (Sep. 30, 2024), <https://www.wfp.org/news/hunger-haiti-reaches-historic-high-one-two-haitians-now-acute-hunger>; OCHA, *Haiti — Advocacy note for the immediate mobilization of resources, August 2024* (Aug. 21, 2024), p. 3; Pan American Health Organization (PAHO), *Hygiene and Sanitation: Keys to Epidemic Prevention among Displaced Populations in the Port-au-Prince Metropolitan Area* (Aug. 5, 2024), <https://www.paho.org/en/news/5-8-2024-hygiene-and-sanitation-keys-epidemic-prevention-among-displaced-populations-port-au>; Pierre, *Painful Living Situation: Homeless in a Fish Market* (Jul. 29, 2024); Pierre Louis, *Conditions sanitaires alarmantes pour les déplacés internes logés au local du MENFP* (Jul. 25, 2024). According to information shared by a network of healthcare organizations operating in Haiti, IDPs in an encampment in Léogâne (a commune in the West Department) are experiencing respiratory issues, skin problems, and urinary tract infections due to the poor living conditions.

¹⁰² See notes 286-89 and associated text.

¹⁰³ Louis-Jeune, *La Gônave: A risky journey for families forced to flee to Arcahaie due to insecurity* (Nov. 18, 2024) (reporting that “no central state authority is providing assistance to the [local] authorities on site in La Gonâve to support the refugees” that fled there after being displaced by armed group attacks in Arcahaie); OHCHR, *Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns* (Sep. 20, 2024), <https://www.ohchr.org/en/statements/2024/09/haiti-william-oneill>

[expert-des-nations-unies-sur-la-situation-des-droits](#) (“Civil society organizations often take on the State’s role in providing basic needs to the population. . . . in displaced persons’ camps.”); AlterPresse, *Haiti-Crise : Promesses, beaux discours, l’équipe de transition multiplie les rencontres sans véritables actions concrètes* (Jul. 12, 2024), <https://www.alterpresse.org/spip.php?article30668> (“No social program has yet been implemented to address the suffering of thousands of displaced people.”). According to information shared by a network of healthcare organizations operating in Haiti, there has been no government assistance for displaced women and children living in parks and on the street in Léogâne.

¹⁰⁴ OCHA, *Haiti – Advocacy note for the immediate mobilization of resources, August 2024* (Aug. 21, 2024), p. 6 (as a result, “the few isolated responses provided are neither coordinated nor monitored, leaving gaps unaddressed”); IOM, *Haiti – Summary of results from assessment of suicidal behavior in the Metropolitan Area of Port-au-Prince and recommendations for suicide prevention* (Mar. 2024), p. 3 (reporting that larger sites are more likely to be supervised and coordinated by authorities, and therefore also to be better serviced by humanitarian actors).

¹⁰⁵ See note 291.

¹⁰⁶ IOM, *Haiti – Report on the internal displacement situation in Haiti – Round 8* (Sep. 2024), p. 3 (women and girls represent 54% of all IDPs, and children of both sexes represent 52%).

¹⁰⁷ OCHA Financial Tracking Service, *Haiti Besoins Humanitaires et Plan de Réponse 2024*, <https://fts.unocha.org/plans/1178/summary> (last visited Dec. 4, 2024) (as of December 1, the protection sector under the Humanitarian Response Plan 2024 is just 29.2% funded). See also notes 574-75.

¹⁰⁸ REGAH HAITI, IDEJEN & UN Women, *Addressing Haitian women’s particular needs through their leadership role* (Jul. 2024), ¶ 9.

¹⁰⁹ Global Centre for the Responsibility to Protect, *Haiti* (Dec. 1, 2024); Juhakenson Blaise, *Gangs’ grip on Haitian capital spurs new kind of street vendor: Men selling cooked rice*, *Haitian Times* (Jul. 18, 2024), <https://haitiantimes.com/2024/07/18/haitian-men-selling-cooked-rice-on-the-streets/> (“Kidnapping has become an industry, generating millions annually.”).

¹¹⁰ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 24 (reporting 443 people from June to August, over three times as many in the same three-month period in 2023); *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 114 (reporting 1,162 people between January and June). See also UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 10 (reporting that armed groups kidnapped at least 893 people between January and June); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 16 (reporting that armed groups abducted 971 people between January and May, including 342 women, 13 girls and 13 boys).

¹¹¹ UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 10 (“35 per cent of kidnappings took place in the West Department and 65 per cent in the Artibonite Department.”).

¹¹² BINUH, *Quarterly report on the human rights situation in Haiti* (April-June 2024), p. 8.

¹¹³ OHCHR, *Haiti’s “chaotic violence” can be resolved, Türk declares* (Oct. 8, 2024), <https://www.ohchr.org/en/statements-and-speeches/2024/10/haitis-chaotic-violence-can-be-resolved-turk-declares/>; *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 114; UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 12; BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 37.

¹¹⁴ UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 12 (“The mass kidnapping of individuals travelling on public transport has become a pervasive practice, notably along Route Nationale 1 and Route Nationale 2. . . . Incidents such as the hijacking of boats, the theft of goods and fishers’ boat engines and kidnappings were also recorded as the population increasingly resorted to travelling by boat to avoid overland routes, extending insecurity to the sea.”); BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 40 (“[G]ang attacks against boats crossing the bay of Port-au-Prince increased, with at least five boats transporting products attacked and ransacked, 5 passengers and crew members injured by gunshots and 23 others kidnapped.”); Robles, *At Least 70 People Dead in Gang Attack in Haiti* (Oct. 4, 2024).

¹¹⁵ See, e.g., Insecurity Insight, *Haiti: Violence Against Health Care in Conflict 2023*, p. 5 (Sep. 2, 2024), <https://reliefweb.int/report/haiti/haiti-violence-against-health-care-conflict-2023> (reporting on increased kidnapping of health workers, who are likely “targeted for their perceived wealth”).

¹¹⁶ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 40 (“Hostages are often tortured and killed if a ransom is not paid.”); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 37 (“Victims are subjected to further abuse, including rape and other forms of sexual violence, while in captivity. Some are tortured and subjected to horrific burn injuries. Videos of the abuses are shared by gang members on social media, reportedly to force the victims’ family members to pay a ransom. In instances where families are unable to pay the ransom, hostages have been killed.”).

¹¹⁷ UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 12; BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 37 (“Kidnapping victims who resist are also systematically killed.”). See also BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 45 (“[A] failed kidnapping, prevented by the population, resulted in a violent retaliation which left 11 people killed or injured, including an infant, and 3 others abducted.”); Fenel Pélissier, *The Artibonite region under gang control despite the state of emergency*, *Ayibo Post* (Sep. 3, 2024), <https://ayibopost.com/police-officers-in-artibonite-appeal-for-help/>.

¹¹⁸ The arrival of MSS forces has not meaningfully improved the security situation. See note 535.

¹¹⁹ See, e.g., U.S. Department of State, *United States Delivers Additional Equipment for the Haitian National Police and Multinational Security Support Mission in Haiti* (Nov. 4, 2024), <https://www.state.gov/united-states-delivers-additional-equipment-for-the-haitian-national-police-and-multinational-security-support-mission-in-haiti/>; Reuters, *Taiwan delivers*

protective equipment to Haiti security forces (Aug. 29, 2024), <https://www.reuters.com/world/taiwan-delivers-protective-equipment-haiti-security-forces-2024-08-29/>; Roberson Alphonse, *New Equipment Arrives for the PNH and MSS*, Le Nouvelliste (Aug. 23, 2024), <https://lenouvelliste.com/en/article/249868/de-nouveaux-equipements-sont-arrivees-pour-la-pnh-et-la-mmas>; U.S. Department of State, *Assistant Secretary for Western Hemisphere Affairs Brian Nichols and Assistant Secretary for International Narcotics and Law Enforcement Todd Robinson On Haiti* (Jul. 3, 2024), <https://www.state.gov/assistant-secretary-for-western-hemisphere-affairs-brian-nichols-and-assistant-secretary-for-international-narcotics-and-law-enforcement-todd-robinson-on-haiti/>.

¹²⁰ GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 2* (Nov. 2024), p. 4; Onès Joseph, *Gang terror in rural Haiti's Artibonite claims 10 lives, destruction of homes and farms*, Haitian Times (Aug. 28, 2024), <https://haitiantimes.com/2024/08/28/gros-morne-artibonite-gang-attack/> (according to the mayor of Gros-Morne, “[the] commune of nearly 160,000 inhabitants does not even have 15 on-duty police officers,” leaving it “at the mercy of the gangs”); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 22 (the lack of “adequately specialized personnel . . . hinders its capability to effectively address all gang attacks and regain authority over gang-controlled neighbourhoods”); Onès Joseph, *10 killed, one critically injured and eight homes burned by gangs in Haiti's Artibonite rural community*, Haitian Times (Jun. 18, 2024), <https://haitiantimes.com/2024/06/18/gang-violence-in-haitis-terre-neuve-and-gros-morne/> (police were unable to respond to violence in Terre-Neuve and Gros-Morne because they were “outmanned and outgunned”). See also <https://haitiantimes.com/2024/10/23/government-recalls-police-soldiers-from-vip-protection-amid-gang-attacks/> (elite units within the PNH had been tasked with “protecting VIPs” until they were reassigned to combat zones in late October).

¹²¹ Pélassier, *The Artibonite region under gang control despite the state of emergency* (Sep. 3, 2024) (departmental police executives in the Artibonite complained in September that nothing has changed since the transitional government took over, and that police are still waiting for new equipment and more personnel); Onès Joseph, *Gonaïves residents mobilize in sit-in to demand police action against gang-led insecurity*, Haitian Times (Aug. 15, 2024), <https://haitiantimes.com/2024/08/15/gonaives-residents-mobilize-against-insecurity/> (“[T]he departmental director of the PNH in the city [Gonaïves]. . . . stated that the police lack the resources, including an armored tank, to confront the heavily armed gangsters in the *Kokorat San Ras* group.”); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶¶ 17, 23 (Haiti’s coastguard has just four operational vessels, and “[o]f the overall fleet of 47 armoured vehicles, only 20 were operational, with 10 permanently out of use as result of gang violence”); RNDDH, *Survey on the Functioning of the PNH: Police Officers Demand Better Working Conditions*, ¶¶ 50-52 (Jun. 12, 2024), https://web.rnddh.org/wp-content/uploads/2024/06/5-Rap-PNH-12Juin2024.ENG_-1.pdf (90% of police officers surveyed by RNDDH “stated that they do not have adequate and sufficient materials to perform their work,” and many stated “they often find themselves having to procure everything themselves”). See also Roberson Alphonse, *Quand le RNDDH documente l'horreur à Carrefour et Gressier*, Le Nouvelliste (Aug. 16, 2024), <https://lenouvelliste.com/article/249728/quand-le-rnddh-documente-lhorreur-a-carrefour-et-gressier> (RNDDH accuses the TPC and the government of spending money renewing their own vehicles “while the police institution struggles to find less than three hundred thousand (300,000) US dollars for the repair of its service vehicles and its armored vehicles”); Jacqueline Charles, *Haiti prime minister asks police, army and Kenya forces to target gang areas*, Miami Herald (Jul. 18, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article290174534.html> (“[T]he Kenyans came to face-to-face with another reality of policing in Haiti: inoperable vehicles. One of the new armored vehicles being driven by the Kenyans had a mechanical failure and had to be towed away, a spokesman with the Kenya-led mission confirmed.”).

¹²² Phillips & Côté-Paluck, *This is effectively a civil war': despair in Haiti as gangs step up assault on capital* (Oct. 30, 2024) (“‘I feel disorientated,’ said one senior police officer, admitting that his troops lacked the armament to retake such areas [under the control of armed groups].”); *Letter to Secretary Antony Blinken, Secretary Alejandro Mayorkas, Secretary Gina Raimondo, and Attorney General Merrick Garland from Members of Congress*, p. 1 (Sep. 26, 2024), https://www.warren.senate.gov/imo/media/doc/final_-_warren_cardin_cherfilus_mccormick_meeks_haiti_arms_trafficking_letter.pdf (“Haiti’s armed groups have thousands of members, many equipped with powerful assault weapons that outnumber the Haitian National Police.”); Joseph, *10 killed, one critically injured and eight homes burned by gangs in Haiti's Artibonite rural community* (Jun. 18, 2024). See also UNSC, *Report of the UN Office on Drugs and Crime* (Oct. 16, 2024), ¶ 28 (noting that “the Haitian coast guard suffers from extremely limited resources and capacity”); *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶¶ 77-78 (describing mismanagement within the PNH leading to diversions from police weapons stockpiles that are fueling violence by armed groups); Prosper et al., *Haiti's Gang Violence Is a Symptom of Its Political Crisis*, Jacobin (Aug. 14, 2024) (“[O]ver the last thirteen years, the PHTK regime has systematically underfunded and under-armed its own armed forces.”).

¹²³ Le-Cour-Grandmaison, *Haiti, caught between political paralysis and escalating violence* (Nov. 25, 2024) (noting “serious deficits in police intelligence”); GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 2* (Nov. 2024), p. 1 (“[O]perational shortcomings [within the PNH] benefit the gangs who continue, to a large extent, to play cat-and-mouse with the forces of law and order”); OHCHR, *Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns* (Sep. 20, 2024) (“The police lack the logistical and technical capacity to counter the gangs. ‘The situation borders on the impossible. We have to learn to walk on water,’ said a policeman at the Jérémie police station.”). See also RNDDH, *Survey on the Functioning of the PNH: Police Officers Demand Better Working Conditions* (Jun. 12, 2024), ¶¶ 54-58 (describing the lack of sufficient security protocols to protect police officers performing their duties).

¹²⁴ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 23 (“[N]ational police, with the support of the Armed Forces of Haiti and the Multinational Security Support mission, launched large-scale anti-gang operations in the Port-au-Prince neighbourhoods of Solino, Fort National and La Saline, and Delmas and Croix-des-Bouquets, but still face challenges to sustain control over these areas due to the lack of personnel and other resources.”); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 63 (describing “the ongoing reduction in the strength and capabilities of the Haitian National Police”).

The transitional government has been taking steps to rebuild the Haitian Armed Forces (FAd’H) – which have a long history of being used as tools of political violence and were disbanded in 1995 – as part of a so-called “integrated security strategy” to combat the armed groups. The government appointed a new FAd’H Chief of Staff in August; started an ambitious recruitment

process with the goal “to train 20,000 soldiers over the next 5 years, at a rate of 4,000 recruits per year”; and transferred all equipment and vehicles from the National Equipment Center to the FADH headquarters. It is unknown whether any cadets have begun training, but according to the Haitian Defense Ministry, at least 3,000 potential recruits have been selected to undergo physical and mental tests. Valéry Daudier, *FADH: Haiti Aims to Train 20,000 Soldiers over the Next Five Years*, Le Nouvelliste (Oct. 22, 2024), <https://lenouvelliste.com/en/article/251045/fadh-haiti-aims-to-train-20000-soldiers-over-the-next-five-years>; UNSC, *Report of the UN Office on Drugs and Crime* (Oct. 16, 2024), ¶ 22; BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 29; Evens Sanon & Dánica Coto, *Haiti’s army wants recruits to fight gangs, and youths jump at the rare job offer*, AP News (Aug. 28, 2024), <https://apnews.com/article/haiti-military-soldiers-recruits-gang-violence-cd52951a607aed6fa8d54a0e1f6cd4f6>; Robenson Geffrard, *General Derby Guerrier Assumes Official Command of the Haitian Forces*, Le Nouvelliste (Aug. 20, 2024), <https://lenouvelliste.com/en/article/249796/general-derby-guerrier-assumes-official-command-of-the-haitian-armed-forces>. See also IJDH, *Bringing Justice to Victims of the Raboteau Massacre* (May 21, 2020), <https://www.ijdh.org/our-work/justice-sector-and-impunity/impunity/raboteau-massacre-accountability/>.

¹²⁵ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 117 (between January and September, “approximately 1,000 officers had left the institution due to desertion, resignation or emigration”); BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 28 (reporting that 61 police officers left the force between July and September, primarily due to “post abandonments, deaths or disciplinary dismissals”); Dánica Coto, *Dominican president warns of ‘drastic measures’ if anti-gang mission in Haiti fails*, AP News (Sep. 25, 2024), <https://apnews.com/article/un-haiti-dominican-republic-gangs-06ddf6972aee4e9fbc3c64893dc47e5f> (according to former Prime Minister Conille, approximately 25% of the police force has left the country). See also Ralph Thomassaint Joseph, *Members of Elite Haiti Police Force Lost in New York as Asylum Seekers and Parolees*, Documented (Jun. 28, 2024), <https://documentedny.com/2024/06/28/haiti-police-kenya-asylum/> (four police officers who fled Haiti for the United States did not do so “because they feared death at the hands of the gangs, but rather that their lives would be lost fighting for an institution that doesn’t care if they live or die”). See also note 474 and associated text. But see BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 28 (“To partly mitigate the loss of police officers, which is estimated to be over 1,000 in 2024, a four-month, fast-track basic training of the thirty-fourth cadet class began on 25 August with 747 cadets, including 216 women (29 per cent), the highest representation of women in the training history of the national police.”).

¹²⁶ UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 28 (following a rally to protest the deaths of three PNH officers in clashes with armed groups, “police unions and human rights organizations have denounced harsh working conditions and the lack of accountability for those killings”); Al Jazeera, *Haiti to replace national police chief in effort to counter gang violence* (Jun. 15, 2024), <https://www.aljazeera.com/news/2024/6/15/hait-to-replace-national-police-chief-amid-gang-violence> (“Police officers’ regular complaints included late pay, insufficient training, workplace harassment, dismissal threats, knife and gunshot injuries and equipment shortages.”); RNDDH, *Survey on the Functioning of the PNH: Police Officers Demand Better Working Conditions* (Jun. 12, 2024), ¶ 112 (“[T]he general working conditions of PNH officers are a source of great frustration and reflect the Haitian state’s lack of consideration for officers.”). See also Jeffsky Poincy, *Rethinking the International Response to Haiti’s Security Crisis*, Stimson (Jul. 23, 2024), <https://www.stimson.org/2024/rethinking-the-international-response-to-haitis-security-crisis/> (pay disparities between the PNH and the MSS threaten “to further erode the already low morale of Haitian police officers on the frontlines against gangs, ultimately undermining the cohesion of the force and further exacerbating attrition rates”).

¹²⁷ According to information shared by a UN official.

¹²⁸ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 117 (reporting 12,931 officers as of June 30). See also Al Jazeera, *Haiti to replace national police chief in effort to counter gang violence* (Jun. 15, 2024) (“As of 2023, the police force had just more than 13,200 personnel, according to the UN. The international organisation has warned that only about 4,000 police are on duty at any given time in a country of 11 million.”); Jacqueline Charles, *Why Haiti’s gangs are gaining ground despite the presence of an international armed force*, Miami Herald (Dec. 4, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article295937349.html> (“The Haiti National Police has one officer for every 1,000 residents, based on its claim of a total force of 12,000. In the developing world, the standard is twice as many officers per 1,000 people.”).

¹²⁹ Juhakenson Blaise, *Officer killed by gangs as Haitian police death count hits 25 in 2024*, Haitian Times (Sep. 24, 2024), <https://haitiantimes.com/2024/09/24/police-officer-pierre-louis-killed-by-gunfire-in-haiti/>; RNDDH, *Survey on the Functioning of the PNH: Police Officers Demand Better Working Conditions* (Jun. 12, 2024), ¶ 2, 58.

¹³⁰ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶¶ 29, 43, 72 (armed groups have established strategic checkpoints from which they “could keep watch and disrupt police operations, with snipers shooting from the tops of vandalized buildings”; dug trenches and erected barricades along points of access; tracked police movements using drones and scouts; and “placed gas cylinders and prepared Molotov cocktails to use against police during operations”); BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 42 (in a particularly gruesome example, “a police officer in Gressier was taken by gang members and forced to eat parts of his mutilated body before being burned alive”); UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 30 (“[I]n Carrefour, gangs threatened police officers living in the area to force them to abandon their homes and move to other parts of the capital. . . . [T]wo Divisional Inspectors of the Haitian National Police who had refused to move out of the area were killed at the beginning of July 2024, inside their homes, where they were shot several times by gang members.”); RNDDH, *Murders, Rapes, Looting, and Arson in Carrefour and Gressier Under the Indifferent Gaze of the New State Authorities* (Aug. 15, 2024), ¶ 93 (“[I]n Bwa Boko, a locality in Gressier, all the houses where police officers lived, as well as those nearby, were looted and burned”); Jacqueline Charles, *Kenyan commander denies Haiti police had to rescue his forces during joint operation*, Miami Herald (Aug. 14, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article290995965.html> (reporting that armed groups retaking Ganthier ambushed police officers as they slept). See also GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 2* (Nov. 2024), p. 7 (describing armed groups’ “resilience and strategic planning,” which “underscores the need for a

reassessment of tactical approaches, more robust support and deeper community engagement to counter the gang's entrenched presence”).

¹³¹ See Blaise, [Officer killed by gangs as Haitian police death count hits 25 in 2024](#) (Sep. 24, 2024). See also Coto, [Dominican president warns of 'drastic measures' if anti-gang mission in Haiti fails](#) (Sep. 25, 2024) (according to former Prime Minister Conille, “two [police officers] are wounded and one killed every week”).

¹³² BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 27; [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶¶ 40, 44; Wilentz, [JD Vance's Slanders Are Far From the Worst Thing the US Has Done to Haitians](#) (Sep. 11, 2024) (“[B]arely a police headquarters in the capital or its environs has been left untouched by arson and looting.”); Lenz Beth Ferlyn Alparète, [Des gangs armés attaquent le commissariat de Cabaret](#), Juno7 (Aug. 14, 2024), <https://www.juno7.ht/des-gangs-armes-attaquent-le-commissariat-de-cabaret/> (armed groups attacked the police station in Cabaret on August 13); Charles, [What a gang attack in a rural Haiti town says about the Kenya-led security mission](#) (Jul. 26, 2024) (on July 21, “gang members invaded . . . Ganthier, setting fire to the police station and a customs annex”); Charles, [Haiti prime minister asks police, army and Kenya forces to target gang areas](#) (Jul. 18, 2024) (armed groups attempted to take over a police station in the Artibonite Department on July 15, leaving four dead and 11 injured, and attacked the central police station and a substation in Carrefour in April); Roberson Alphonse, [Gressier Faces Bandit Terror, Palmes Region Under Threat](#), Le Nouvelliste (Jul. 2, 2024), <https://lenouvelliste.com/en/article/248928/gressier-faces-bandit-terror-palmes-region-under-threat> (armed groups attacked the police station in Gressier on June 30); Blaise, [Over 25 killed and many kidnapped by gangs in Gressier, Haiti](#), (Jul. 2, 2024) (it took the police over 24 hours to regain control of the police station in Gressier); RNDDH, [Survey on the Functioning of the PNH: Police Officers Demand Better Working Conditions](#) (Jun. 12, 2024), ¶¶ 63-66 (RNDDH recorded at least 68 attacks on “police stations, prisons, specialized unit bases, and fixed and mobile patrols” between June 1, 2021 and June 2024).

¹³³ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 21; GI-TOC, [Observatory of Violence and Resilience in Haiti: Issue 2](#) (Nov. 2024), pp. 4-5.

¹³⁴ [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 117. But see Haiti Libre, [Haiti - Security : Official reopening of the Liancourt Police Station](#) (Nov. 27, 2024), <https://www.haitilibre.com/en/news-43723-haiti-security-official-reopening-of-the-liancourt-police-station.html>.

¹³⁵ Nyaboga Kiage & Wycliffe Nyaberi, [Gunbattle as Kenyan police try to liberate Ganthier town from Haitian gangs](#), The Nation (Jul. 29, 2024), <https://nation.africa/kenya/news/gunbattle-as-kenyan-police-try-to-liberate-ganthier-town-from-haitian-gangs-4705484>; Dominican Today, [Haitian gangs maintain power despite arrival of Kenyan troops](#) (Jul. 1, 2024), <https://dominantoday.com/dr/world/2024/07/01/haitian-gangs-maintain-power-despite-arrival-of-kenyan-troops/>.

¹³⁶ Odigène, [Croix-des-Bouquets: '400 Mawozo' Gang Strongly Barricades National Road #8](#) (Jul. 9, 2024) (although the PNH were informed about armed group activity in Croix-des-Bouquets, they did nothing, and “[t]he authorities are powerless against the increasing crimes committed by the bandits who reign supreme in the commune”); Jacqueline Charles, [How a gang attack in rural Haiti turned into tragic bloodbath, leaving death, destruction](#), Miami Herald (Jun. 21), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article289446980.html> (police failed to respond to calls for help during a multi-hour gang attack on June 14 and 15 that killed at least 11 people).

¹³⁷ See, e.g., Charles, [Kenyan commander denies Haiti police had to rescue his forces during joint operation](#), Miami Herald (Aug. 14, 2024).

¹³⁸ GI-TOC, [Will the Artibonite massacre be a turning point in Haiti?](#) (Oct. 9, 2024); ECCREDHH, [Rapport sur le Massacre à Pont-Sondé, ECCREDHH accuse le Gouvernement Conille et le Haut Commandement de la Police Nationale d'Haiti \(PNH\)](#) (Oct. 7, 2024), pp. 1-2; FJKL, [Massacre de Pont Sondé : A qui la faute ? La FJKL s'interroge](#) (Oct. 2024), ¶¶ 2, 4, 15, 26-32, 41, 47-49.

¹³⁹ AlterPresse, [Haïti-Criminalité : Les communautés de Pernier réclament de la part de la police la même attention que pour Vivy Mitchel et Belvil](#) (Nov. 22, 2024), <https://www.alterpresse.org/spip.php?article31155> (police have reportedly abandoned a number of communities around Pernier, a neighborhood in Port-au-Prince); [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 37 (“Since February 2024, the Ti Bwa gang, led by Christ-Roi Chery (alias “Chrisla”), has taken control of the Carrefour commune. There has been no police presence in the area since mid-May 2024, when two police stations were attacked.”); Odigène, [Croix-des-Bouquets: '400 Mawozo' Gang Strongly Barricades National Road #8](#) (Jul. 9, 2024) (there has been no police presence in Croix-des-Bouquets since the police station was attacked in March, other than occasional interventions in response to emergencies); Roberson Alphonse, [Gangs Control "75% of Gressier,"](#) Le Nouvelliste (Jul. 8, 2024), <https://lenouvelliste.com/en/article/249017/gangs-control-75-of-gressier> (the police chief, Normil Rameau, “clarified that 7 communes in the country have no police presence”); Jean Junior Celestin, [Bandits Torch Town Hall in Croix-des-Bouquets](#), Le Nouvelliste (Jun. 27, 2024), <https://lenouvelliste.com/en/article/248862/bandits-torch-town-hall-in-croix-des-bouquets> (according to the Croix-des-Bouquets interim executive agent, “[t]here is no police presence in the commune. The town is at the mercy of the bandits. They reign supreme and impose their own laws”); Le Nouvelliste, [Bon Repos: subir la loi des gangs pour survivre](#) (Jun. 11, 2024), <https://lenouvelliste.com/article/248583/bon-repos-subir-la-loi-des-gangs-pour-survivre> (there has been no police or government presence in Bon Repos since the attack on the sub-police station there).

¹⁴⁰ Le-Cour-Grandmaison, [Haiti, caught between political paralysis and escalating violence](#) (Nov. 25, 2024) (“Gangs and public forces hound each other, but the police do not seem to have the capacity to penetrate or occupy disputed areas over the long term.”); GI-TOC, [Observatory of Violence and Resilience in Haiti: Issue 2](#) (Nov. 2024), p. 2 (“[N]either the MSS mission nor the HNP seem capable of responding to the opening up of simultaneous fronts scattered across the country. This is due to human, technical and logistical shortcomings, as well as to the difficulty of the public forces to project themselves quickly, inside or outside the capital, and to occupy the terrain in the medium or long term. These operational shortcomings benefit the gangs, who continue to play a game of cat and mouse with the public forces, catching police operations off guard or nullifying their efforts by retaking disputed territories as soon as the officers leave.”). See also <https://lenouvelliste.com/en/article/250861/kokorat-gang-from-artibonite-kidnaps-two-officials-from-saint-marc-school-district-office> (“Some residents of Saint-Marc have stated that

police authorities in Port-au-Prince boast impressive statistics about operations against gangs in Artibonite, while criminals operate with impunity, continuing to instill fear and mourning in the community.”).

¹⁴¹ The civilian self-protection movement – originally referred to as *Bwa Kale*, meaning “peeled stick” or, in slang, “no mercy” – was first started in April 2023 by residents of Port-au-Prince. The movement has since expanded to other departments. IJDH, [Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2023 through May 2024](#) (Jun. 2024), p. 5.

¹⁴² [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶¶ 26, 45, 116 (self-defense groups have multiplied as civilians urge one another to take up arms against armed groups); Press Release, OHCHR, [Haiti: UN Human Rights chief urges end to intensifying violence in Port-au-Prince](#) (Nov. 20, 2024) (reporting “a rise in mob lynchings”); Charles, [Police, residents kill dozens of Haitian gang members after attack in Pétion-Ville](#) (Nov. 20, 2024) (after the attack by armed groups in Pétion-Ville, civilians “unleashed a response from residents not seen since April of last year when people from the Canapé-Vert neighborhood of Port-au-Prince hunted down and set fire to suspected gang members trying to invade their community”); AlterPresse, [Haïti-Criminalité : La peur commence à changer de camp à Anse d’Hainault](#) (Aug. 13, 2024), <https://www.alterpresse.org/spip.php?article30793> (a self-defense group in Grand’Anse increased from 40 to over 600 *peyizan*, or peasants). See also Le-Cour-Grandmaison, [Haiti, caught between political paralysis and escalating violence](#) (Nov. 25, 2024) (“The number of vigilante units, which have replaced police security in dozens of neighbourhoods in Port-au-Prince, has skyrocketed this year. The anti-gang vigilante brigades on the streets of Haiti personify citizens’ eroded trust in the ability of state law enforcement agents to deal effectively with the gang violence.”); Jacqueline Charles, [More than 100 suspected gang members have been killed as vigilantism grows in Haiti](#), Miami Herald (Nov. 25, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article295990494.html> (the expansion “underscore[s] not just gangs’ escalating terror, but the lengths to which a fed-up population is going to protect itself as the gangs increasingly take control of more neighborhoods in metropolitan Port-au-Prince and the neighboring Artibonite Valley”). In August, the Ministry of Justice and Public Security called on the population “to support the Haitian National Police in its efforts to counter the actions of criminal groups,” in what was widely understood to be an encouragement of the *Bwa Kale* movement. AlterPresse, [Haïti-Criminalité : Une quinzaine de présumés bandits lynchés et plusieurs maisons incendiées dans la Grande Anse](#) (Aug. 12, 2024), <https://www.alterpresse.org/spip.php?article30788>; Haiti Libre, [Haiti - Security: The Ministry of Justice seeks to "marry" the population with the PNH](#) (Aug. 24, 2024), <https://www.haitilibre.com/article-40335-haiti-securite-le-ministere-de-la-justice-cherche-a-marier-la-population-avec-la-pnh.html>.

¹⁴³ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶¶ 24, 46 (reporting 149 people killed between June and September); UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 13 (reporting 287 people killed between January and June). See also Charles, [Police, residents kill dozens of Haitian gang members after attack in Pétion-Ville](#) (Nov. 20, 2024) (police and armed civilians killed at least 28 suspected armed group members in November).

¹⁴⁴ Coto & Sanon, [Haiti sees a rise in killings and police executions with children targeted, UN says](#) (Oct. 30, 2024); UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 13.

¹⁴⁵ Charles, [More than 100 suspected gang members have been killed as vigilantism grows in Haiti](#) (Nov. 25, 2024).

¹⁴⁶ See MSF, [MSF outraged by police attack on ambulance and execution of patients in Haiti](#) (Nov. 13, 2024), <https://www.msf.org/haiti-msf-outraged-attack-ambulance-and-execution-patients> (members of civilian self-defense groups and police targeted MSF staff transporting wounded patients); [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 40 (“[S]elf-defence groups have continued to execute individuals allegedly associated with the gangs or suspected of common crimes.”); Charles, [This seaside Haiti town used to draw tourists. Now it draws refugees from gangs](#), (Sep. 24, 2024) (“[I]ncreasing reports of suspected gang members being killed throughout Haiti without warning or due process.”); BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 36 (“In several instances, people have been publicly executed by ‘self-defence groups’ without due process, because they were allegedly affiliated with gangs.”). See also note 329 and associated text.

¹⁴⁷ Charles, [More than 100 suspected gang members have been killed as vigilantism grows in Haiti](#) (Nov. 25, 2024) (“[M]achete-wielding residents joining forces with police” to repel armed groups in Pétion-Ville, with reports “‘in a good number of the cases, the police killed’ the armed individuals and then the population set the corpses on fire.”); MSF, [MSF outraged by police attack on ambulance and execution of patients in Haiti](#) (Nov. 13, 2024); UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 13, 29; FJKL, [Massacre de Pont Sondé : A qui la faute ? La FJKL s’interroge](#) (Oct. 2024), ¶ 14. See also Le-Cour-Grandmaison, [Haiti, caught between political paralysis and escalating violence](#) (Nov. 25, 2024) (discussing the “blurring of lines between police and vigilante groups. . . . where armed militia-type actors are multiplying and increasingly taking control of governance functions”). See also notes 180-98.

¹⁴⁸ UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 13 (“In some areas, those groups have formed alliances with gangs to oppose rival gangs.”).

¹⁴⁹ UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 13, 18 (“They are increasingly using similar strategies to those employed by the gangs, including setting up road checkpoints, extorting (through informal ‘taxation’) drivers and businesses and killing individuals.”); BINUH, [Quarterly report on the human rights situation in Haiti](#) (April-June 2024), pp. 6, 9 (“The “self-defense” group Caravanne, established in Carrefour, has begun to erect “checkpoints” where it carries out criminal acts similar to those committed by gangs.”); BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 36 (“While ‘self-defence groups’ tend to present themselves as protectors of the population in the absence of the police, some have a similar modus operandi to gangs.”).

¹⁵⁰ [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶¶ 45, 53; UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 13; FJKL, [Massacre de Pont Sondé : A qui la faute ? La FJKL s’interroge](#) (Oct. 2024), ¶ 14.

¹⁵¹ Fenel Péliissier, *La Gônave created its own police force using weapons of unknown origin*, Ayibo Post (Jun. 24, 2024), <https://ayibopost.com/la-gonave-created-its-own-police-force-using-weapons-of-unknown-origin/>.

The Haitian Environment Ministry's Brigade for the Security of Protected Areas (**BSAP**) – a government agency turned paramilitary group – is another salient example of the government's lack of control over its own institutions. BSAP is formally a government agency supposed to operate under the umbrella of the Haitian Environment Ministry, officially tasked with protecting environmentally sensitive areas, but since January it has been operating largely outside of the law. According to the UN Panel of Experts, BSAP has some 6,000 members, 95% of whom are not on any institutional payroll, who “perform de facto police work and engage in a range of criminal activities.” They also contribute to the proliferation of illegal arms and ammunition in Haiti, and many Haitians identify BSAP “as a primary threat to the stability of the country.” *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶¶ 53, 65, 83-85; Onz Chéry, *Haitian official accused of using fake security unit to seize land, harass resident*, Haitian Times (Oct. 21, 2024), <https://haitiantimes.com/2024/10/21/augustin-unlawfully-installs-bsap-agents/>. See also IJDH, *Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2023 through May 2024* (Jun. 2024), notes 17, 49 and associated text.

¹⁵² Civicus Monitor, *Civic freedoms under threat amid rising political instability and criminal gang violence* (Oct. 14, 2024), <https://monitor.civicus.org/explore/civic-freedoms-under-threat-amid-rising-political-instability-and-criminal-gang-violence/>; UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 17; RHI News, *La précarité des journalistes en Haïti : un débat de l'AJHE sur fond d'insécurité et d'accusations de collusion avec les gangs armés...* (Sep. 16, 2024), <https://www.rhinews.com/actualites/la-precarite-des-journalistes-en-haiti-un-debat-de-lajhe-sur-fond-dinsecurite-et-daccusations-de-collusion-avec-les-gangs-armes/>; David C. Adams, *Haitian press face 'existential crisis' with no end to gang violence*, Committee to Protect Journalists (CPJ) (Jul. 24, 2024), <https://cpj.org/2024/07/haitian-press-face-existential-crisis-with-no-end-to-gang-violence/>; BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 35.

¹⁵³ Adams, *Haitian press face 'existential crisis' with no end to gang violence* (Jul. 24, 2024). According to information shared by Pascale Solages, the cofounder of Haitian feminist organization *Nègès Mawon*, her organization is being forced to move to a new office after two armed men came asking for money. This is the second time *Nègès Mawon* has been forced to relocate due to attacks and threats. Solages also shared that three of her staff members have been displaced, and that she and her staff have had to cancel multiple events because the insecurity makes it too dangerous for any of her staff to go outside. She noted that staff calls have been interrupted by gunshots in the background, and that one staff member had to remain silent on the call so as not to make noise that might draw an attack by armed groups. Violence by armed groups has likewise prevented staff at Haitian human rights law firm the *Bureau des Avocats Internationaux (BAI)* from reaching the office safely, according to information shared by Managing Attorney Mario Joseph, impeding the law firm's activities. The BAI office was struck by a bullet in November, although no staff were injured. See also <https://www.haitilibre.com/en/news-43664-haiti-news-zapping.html> (reporting that unknown persons vandalized the offices of the Office for the Protection of the Citizen, Haiti's human rights ombudsman).

¹⁵⁴ CPJ, *Haitian journalist attacked as gang violence again surges in country* (Nov. 20, 2024), <https://cpj.org/2024/11/haitian-journalist-attacked-as-gang-violence-again-surges-in-country/> (in November, armed group members shot at journalist Wandy Charles and his family and burned the home of reporter Lookens Jean-Baptiste); Jean Junior Celestin, *AJH and SOS Journalists Condemn Gang Threats Against Journalists and Call for Response*, Le Nouvelliste (Oct. 23, 2024), <https://lenouvelliste.com/en/article/251061/ajh-and-sos-journalists-condemn-gang-threats-against-journalists-and-call-for-response>; Sanon & Coto, *Haiti's Justice Ministry warns of threats against the prime minister and his Cabinet* (Oct. 22, 2024) (“Gang leaders accused of orchestrating the recent attacks have threatened journalists covering the violence, calling them out by name as they order them killed.”); CPJ, *Haitian journalist threatened over article about Reuters reporters' gifts to gang leader* (Sep. 30, 2024), <https://cpj.org/2024/09/haitian-journalist-threatened-over-article-about-reuters-reporters-gifts-to-gang-leader/> (Jimmy Chérizier made threats against the editor-in-chief of AyiboPost, Widlore Mérancourt, after Mérancourt reported that two foreign journalists had given Chérizier inappropriate gifts). Read Mérancourt's article here: Widlore Mérancourt, *Reuters Journalists' Gifts to a Notorious Haiti Gang Leader Spark Controversy*, Ayibo Post (Sep. 18), <https://ayibopost.com/reuters-journalists-gifts-to-a-notorious-haiti-gang-leader-spark-controversy/> (noting that the actions of the foreign journalists' make the work of local reporters even more difficult).

¹⁵⁵ Juhakenson Blaise, *Internet blackout cuts life-line for millions as gang attacks in Haiti worsen*, Haitian Times (Oct. 24, 2024), <https://haitiantimes.com/2024/10/24/haiti-internet-connectivity-issues-amid-gang-attacks/>.

¹⁵⁶ CPJ, *Haiti, Israel most likely to let journalists' murders go unpunished, CPJ 2024 impunity index shows* (Oct. 30, 2024), <https://cpj.org/thematic-reports/haiti-israel-most-likely-to-let-journalists-murders-go-unpunished-cpj-2024-impunity-index-shows/>; RHI News, *SOS Journalistes dénonce l'impunité et appelle le Gouvernement Conille à réagir dans l'affaire Garry Tesse...* (Aug. 14, 2024), <https://www.rhinews.com/actualites/sos-journalistes-denonce-limpunite-et-un-appel-au-gouvernement-conille-a-reagir-dans-laffaire-garry-tesse/>. See also Sanon & Coto, *Haiti's Justice Ministry warns of threats against the prime minister and his Cabinet* (Oct. 22, 2024) (following increased threats against reporters in October, the Association of Haitian Journalists called on authorities to do more to protect journalists).

¹⁵⁷ Adams, *Haitian press face 'existential crisis' with no end to gang violence* (Jul. 24, 2024) (“Besides a handful of major TV, radio and print outlets, Haiti has hundreds of small radio and TV stations, many of them operating on social media platforms with tiny budgets and only a handful of mostly freelance reporters. Many media outlets have been forced to cut staff due to falling advertising and others say they are close to being forced out of business.”).

¹⁵⁸ Celestin, *AJH and SOS Journalists Condemn Gang Threats Against Journalists and Call for Response*, Le Nouvelliste (Oct. 23, 2024); RHI News, *La précarité des journalistes en Haïti : un débat de l'AJHE sur fond d'insécurité et d'accusations de collusion avec les gangs armés...* (Sep. 16, 2024); Adams, *Haitian press face 'existential crisis' with no end to gang violence* (Jul. 24, 2024).

¹⁵⁹ See Prosper et al., *Haiti's Gang Violence Is a Symptom of Its Political Crisis*, Jacobin (Aug. 14, 2024) (“The gangs of today — founded or enhanced by PHTK rulers, other politicians, and key oligarchs — are the new death squads. . . .”); Lyonel Trouillot, *Fin aux exactions et à la violence des « chefs »*, Ayibo Post (Jul. 11, 2024), <https://ayibopost.com/lyonel-trouillot-fin-aux-exactions-et-a-la-violence-des-chefs/> (“Beatings, seizure and illegal appropriation of other people's property, disturbances of public life, violation of private spaces, extortion, illegal arrest or more precisely sequestration of people, all this is common practice, a legacy of Duvalierism brought back into the spotlight by the PHTK”); Press Release, OHCHR, *Haiti: International community must act now to avert tragedy – Türk* (Nov. 3, 2022), <https://www.ohchr.org/en/press-releases/2022/11/haiti-international-community-must-act-now-avert-tragedy-turk> (“There is a desperate need to tackle the root causes of inequality and violence, including systematic corruption and rampant impunity that have crippled the country's development for decades.”). See also note 204.

¹⁶⁰ See notes 190-73, 165 and associated text.

¹⁶¹ See 190, 196.

¹⁶² See 198-79.

¹⁶³ See notes 178-98.

¹⁶⁴ See GI-TOC, *Will the Artibonite massacre be a turning point in Haiti?* (Oct. 9, 2024); Onès Joseph, *Gangs demand hefty ransom for seized homes in Haiti's rural Gros-Morne*, Haitian Times (Sep. 8, 2024), <https://haitiantimes.com/2024/09/08/gangs-seize-families-homes-in-gros-morne/> (a political activist “accused police authorities of colluding with the gangs, allowing them to operate freely”); RHI News, *Création d'une Commission Vérité, Justice et Réparation en Haïti : Sa mission consiste à documenter les crimes commis par les gangs pour formuler des recommandations au gouvernement...* (Sep. 8, 2024), <https://www.rhinews.com/actualites/creation-dune-commission-verite-justice-et-reparation-en-haiti-sa-mission-consiste-a-documenter-les-crimes-commis-par-les-gangs-pour-formuler-des-recommandations-au-gouvernement/>.

¹⁶⁵ TPC members with ties to criminal groups “include affiliates of the *Parti Haïtien Tèt Kale* (PHTK), known for its corruption, connections with gangs, and control of Haiti for the past dozen years [the December 21 Agreement]; supporters of former acting Prime Minister Claude Joseph, who served the last PHTK president [EDE/RED]; supporters of [former *de facto* prime Minister Ariel] Henry [the January 30 Collective]; and allies of putschist Guy Philippe, who has been convicted in the United States of money laundering related to cocaine trafficking [*Pitit Desalin*].” Pierre Espérance, *U.S. Military Planes Are in Haiti. Haitians Don't Know Why.*, Foreign Policy (Jun. 13, 2024), <https://foreignpolicy.com/2024/06/13/haiti-gangs-violence-us-military-planes-international-security-mission-kenya/>. See also Prosper et al., *Haiti's Gang Violence Is a Symptom of Its Political Crisis*, Jacobin (Aug. 14, 2024) (“To replace Henry's government, the Caribbean Community (CARICOM) facilitated the establishment of a seven-man Presidential Council, with the majority of its members representing the *Parti Haïtien Tèt Kale* (PHTK), which has been in power since 2011.”).

¹⁶⁶ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶¶ 41, 143, 164, 167 (discussing the financing of criminal groups by former senators Rony Célestin and Youri Latortue (both affiliated with the PHTK) and elite economic actors).

¹⁶⁷ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 41 (“Despite a warrant issued for Youri Latortue in January 2024 in relation to charges related to murder, criminal conspiracy and forgery, he continues to use the Raboteau and Kokorat San Ras gangs to exert control over Gonaïves and the wider Artibonite region with total impunity.”). See also GI-TOC, *Will the Artibonite massacre be a turning point in Haiti?* (Oct. 9, 2024) (both armed groups and “vigilante groups. . . . are said to enjoy the support of influential political and economic figures in the region, who have shown a willingness to use violence to extend their control – or protect themselves from it”).

¹⁶⁸ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶¶ 80-82, 169-71 (discussing the diversion of weapons from national stockpiles between 2013 and 2016 by a relative of former President Martelly's wife to armed groups in exchange for their support for Martelly; the trafficking of weapons into the country in 2020 by then-security coordinator at the National Palace; the involvement of the former head of the National Palace General Security Dimitri Hérard in arms trafficking; and the involvement of former senator Rony Célestin in an arms trafficking scheme to supply weapons to the 400 *Mawozo* armed group, which then distributes them to smaller armed groups). See also UNSC, *Report of the UN Office on Drugs and Crime* (Oct. 16, 2024), ¶¶ 20-21 (“[There are] indications that some Haitian public authorities are also selling firearms to purchase plane tickets and shore up their financial reserves to support themselves abroad.”); RHI News, *Le RNDDH accuse le ministre de la Justice de manipulation de dossiers judiciaires et de favoritisme...* (Aug. 22, 2024), <https://www.rhinews.com/actualites/le-rn-ddh-accuse-le-ministre-de-la-justice-de-manipulation-de-dossiers-judiciaires-et-de-complicite-dans-des-affaires-criminelles/> (the former secretary general of the Haitian Bar Association was charged in an arms trafficking case in Port-de-Paix).

¹⁶⁹ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 86 (“Information obtained by the Panel indicates that some Haitian businesspeople involved in imports and exports, as well as civil servants and former senators, are involved in drug trafficking.”).

¹⁷⁰ As of writing, foreign governments had sanctioned at least 11 Haitian officials for collusion with armed groups. See IJDH, *Foreign Sanctions Against Haitian Individuals (December 2020 – Present)*, https://docs.google.com/document/d/1RG0k34CaID3QmxHt1XW-S_C8Aeyj9Vum1qkhtmiopdo/edit (last visited Dec. 4, 2024). See also notes 569-72 and associated text.

¹⁷¹ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 52; UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 29; Joseph, *Gangs demand hefty ransom for seized homes in Haiti's rural Gros-Morne* (Sep. 8, 2024); RNDDH, *Survey on the Functioning of the PNH: Police Officers Demand Better Working Conditions* (Jun. 12, 2024), ¶¶ 6-7; *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶¶ 33, 98 (describing informal arrangements between *G9 an Fanmi* armed group leader Jimmy Chérizier and police officers in Solino and implicating a former policeman in a drug trafficking scheme).

¹⁷² Former PNH chief Frantz Elbé was replaced in June after numerous allegations of wrongdoing and complicity with armed groups. Al Jazeera, [Haiti to replace national police chief in effort to counter gang violence](#) (Jun. 15, 2024) (according to Pierre Espérance, RNDDH Executive Director, “[Elbé] spent his whole time establishing relationships with the gangs, reinforcing the gangs and preventing cops from doing their job and risking their lives”).

Elbé’s replacement, former PNH chief Normil Rameau, has been praised for his “incorruptibility”. RHI News, ‘*Nomination de Normil Rameau à la tête de la PNH : un pas important mais insuffisant*’, *estime la Fondasyon Je Klere...* (Jun. 20, 2024), <https://www.rhinews.com/actualites/nomination-de-normil-rameau-a-la-tete-de-la-pnh-un-pas-important-mais-insuffisant-estime-la-fondasyon-je-klere/>; Jacqueline Charles, *Once ousted as Haiti’s police chief for failing to control gangs, he’s now back in top job*, Miami Herald (Jun. 20, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article289410828.html>. But see Juhakenson Blaise, *Haiti’s transition government appoints new police chief Normil Rameau in efforts to curtail gang violence*, Haitian Times (Jun. 20, 2024), <https://haitiantimes.com/2024/06/20/rameau-normil-new-director-general-of-the-haitian-national-police/> (“During his first stint as PNH’s director general, Normil was accused of laxity in the face of increasing gang violence in Port-au-Prince and its surrounding areas. Then Prime Minister Joseph Jouthe publicly criticized Normil, calling for his resignation due to his inability to deliver security to the people.”); Rezo Nodwes, *Haiti | « Je ne suis pas satisfait » de Rameau Normil, déclare le PM Jouthe, 10 août 2020, qu’en est-il du PM Conille après le massacre sanglant de Pont-Sondé du 3 octobre 2024 qui aurait pu être évité ?* (Oct. 7, 2024), <https://reazonodwes.com/?p=343944> (after the PNH’s failure to intervene in the Pont-Sondé massacre, some are questioning why Rameau is still at the head of the PNH).

¹⁷³ Prosper et al., [Haiti’s Gang Violence Is a Symptom of Its Political Crisis](#), Jacobin (Aug. 14, 2024). See also GI-TOC, [Observatory of Violence and Resilience in Haiti: Issue 1](#) (Jul. 2024), p. 7 (“[T]he former head of presidential security, Dimitri Hérard, who escaped from the central prison during the March attacks. . . . is allegedly helping train *Village de Dieu* [armed group] members in operations to confront the police, coaching them into a more organized, militia-type operation, as well as providing key connections for drugs and arms trafficking.”); [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 31, 48 (“Hérard also . . . helped organize, train and advise [5 *Segond*] gang members.”).

¹⁷⁴ [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶¶ 77-79 (“Over the past four years, close to 1,000 firearms have been diverted from the relatively limited Haitian national police stockpiles. . . . Sources within the police, as well as other first-hand witnesses, told the Panel that some officers sell their ammunition on the illicit market.”); Michelson Césaire, *Police Arrest Presidential Security Officer and Other Suspected Arms Traffickers*, Le Nouvelliste (Oct. 31, 2024), <https://lenouvelliste.com/en/article/251220/police-arrest-presidential-security-officer-and-other-suspected-arms-traffickers>.

¹⁷⁵ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 48 (“Police anti-gang operations resulted in at least 603 people killed (116 members of the population and 487 gang members) and 268 injured (143 members of the population and 125 gang members) from June to September, a 20 per cent decrease compared with the previous four months. . . . Among the victims were children, street vendors and motorcycle taxi drivers.”); UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 14, fn 10 (reporting “a rise in the number of persons allegedly killed or injured during police operations and patrols” between January and June, with 860 people killed and 393 injured). See also Coto & Sanon, [Haiti sees a rise in killings and police executions with children targeted, UN says](#) (Oct. 30, 2024) (police carried out 96 extrajudicial killings between July and September, “point[ing] to a possible disproportionate use of lethal force and a lack of precautionary measures to protect the population during police operations”).

¹⁷⁶ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶¶ 41, 48; UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 14 (“Most victims, including 32 children, were caught in exchanges of fire during police operations while crossing areas on foot to go to school or selling their produce from street stalls.”). See also BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 34 (the increase in clashes between the police and armed groups has led to more people being killed or injured by stray bullets while carrying out daily activities or at home, including young children); Global Protection Cluster, [Protection of internally displaced persons in Haiti](#) (May 2024), p. 4 (“In recent weeks, the protection cluster has documented . . . incidents where IDPs have been killed or injured during shootouts between gangs and the police.”).

¹⁷⁷ [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), Annex 32.

¹⁷⁸ UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 35 (“OHCHR has documented at least 26 alleged criminals and gang members reportedly killed by the prosecutor Jean Ernst Muscadin in Miragoâne. . . . [O]ther public prosecutors seem to have recently resorted to the same practice.”); Jonasson Odigène, *Commissioner Lyvenson Gauthier Questioned Over Alleged Role in Summary Execution*, Le Nouvelliste (Sep. 16, 2024), <https://lenouvelliste.com/en/article/250300/commissioner-lyvenson-gauthier-questioned-over-alleged-role-in-summary-execution>; RHI News, *Le RNDDH interpelle le nouveau ministre de la Justice sur le dysfonctionnement judiciaire en Haïti...* (Jul. 1, 2024), <https://www.rhinews.com/actualites/le-rn-ddh-interpelle-le-nouveau-ministre-de-la-justice-sur-le-dysfonctionnement-judiciaire-en-haiti/> (“The RNDDH has documented ten summary executions carried out by Muscadin in 2022 and 2023.”).

¹⁷⁹ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 48 (attributing some casualties “to police misconduct, including executions and the illegal use of lethal force,” with multiple incidents “of people being interrogated and shot on the spot by police officers”); UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 14 (“Media reported cases of individuals being transported in vehicles to known locations across the capital, such as the Maïs Gâté area, where they were executed by ‘hooded and heavily armed men’, some allegedly police officers.”); Evens Sanon, *Fresh wave of violence erupts in Haiti’s capital over a soccer match*, AP News (Sep. 13, 2024), <https://apnews.com/article/haiti-gang-violence-soccer-match-penalty-5c2889bf4586524c5bafd41aafedf195> (a pastor accused “Haiti’s National Police of stationing officers at the exit of the [Cité Soleil] neighborhood and firing at young men”); BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 34 (“Several killings of unarmed people by specialized police units on patrol in armoured vehicles have been reported. In some instances, police officers have stopped passers-by, interrogated them and then killed them on the spot or in

nearby landfill sites.”); Rezo Nodwes, *Tragédie à Delmas : 4 membres d'une même famille exécutés par des hommes en uniformes de la PNH* (Jun. 17, 2024), <https://rezonodwes.com/?p=335322>. See also note 147.

¹⁸⁰ MSF, *MSF outraged by police attack on ambulance and execution of patients in Haiti* (Nov. 13, 2024); The Guardian, *Doctors Without Borders ambulance in Haiti ambushed and two patients killed* (Nov. 13, 2024), <https://www.theguardian.com/world/2024/nov/13/doctors-without-borders-haiti-ambulance>. See also note 414.

¹⁸¹ See Le-Cour-Grandmaison, *Haiti, caught between political paralysis and escalating violence* (Nov. 25, 2024).

¹⁸² Louis Chadrac, *Pont Sondé Residents Protest Against Authorities in Artibonite*, Le Nouvelliste (Nov. 7, 2024), <https://lenouvelliste.com/en/article/251338/pont-sonde-residents-protest-against-authorities-in-artibonite> (in November, over a thousand residents of Pont-Sondé demonstrated against the government’s inaction with respect to the Pont-Sondé massacre, and in the Artibonite generally); AlterPresse, *De nouvelles mobilisations à Solino et ses environs contre la criminalité en Haïti* (Aug. 19, 2024), <https://www.alterpresse.org/spip.php?article30805> (protesters in August in Canapé-Vert (east of the capital) and downtown Port-au-Prince demanded that the transitional government “take real measures to restore security in the country”).

¹⁸³ See Evens Sanon, *Haitian police tear-gas peaceful protesters as they demand help in stopping gangs*, AP News (Aug. 19, 2024), <https://apnews.com/article/haiti-protests-gangs-police-violence-solino-9291e7d49dd0b914a729a0b7a5090c39>.

¹⁸⁴ See, e.g., Jacqueline Charles & Jay Weaver, *A key police veteran in Haiti’s gang wars, senior cop is now fighting for his freedom*, Miami Herald (Nov. 4, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article294533704.html> (a police officer was arrested in connection with an extrajudicial killing, but the lack of transparency around his alleged involvement and violations of his rights while in custody have prompted concerns about how the PNH “investigates and treats its own officers”); Jacqueline Charles, *Lawyer seeks release of Haiti cop accused of police killing while protecting Blinken*, Miami Herald (Nov. 5, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article295031079.html>.

¹⁸⁵ Wethzer Piercin & Jérôme Wendy Norestyl, *Concern over police impunity in Haiti ahead of multinational intervention*, Ayibo Post (Jun. 10, 2024), <https://ayibopost.com/concern-over-police-impunity-in-haiti-ahead-of-multinational-intervention/> (“The police force . . . very rarely punishes offending officers. The justice system, rendered dysfunctional by repeated strikes, lack of resources and insecurity, often takes several years before rendering a decision. Added to this, the vast majority of Haitian police officers do not wear any number or visible symbol that would allow them to be identified individually, making any attempt at legal prosecution laborious. ‘This disconcerting impunity makes violent police officers more comfortable in their misdeeds,’ analyzes [Défenseurs Plus head of legal affairs] Wilkenson Jean-Denis.”); UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 35 (discussing impunity for extrajudicial executions carried out by public prosecutor Muscadin: “despite the prosecutor’s recognition of his involvement in the killings, as well as government condemnation, no investigation has yet been opened in the case”).

¹⁸⁶ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 52 (“From June to 7 October, the General Inspectorate of the Haitian National Police opened 59 investigations concerning 67 police officers, including 13 cases of alleged human rights violations. During the same period, 17 investigations were concluded, 13 administrative measures were taken and two cases were referred for prosecution.”); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 42 (“Between 17 April and 21 May 2024, the General Inspectorate opened 49 investigations concerning 55 police officers, including 6 cases of alleged human rights violations. During the same period, nine investigations were concluded and two administrative measures were taken. No cases were referred for criminal prosecution”).

¹⁸⁷ See notes 152-58.

¹⁸⁸ The government suspended the Radio Mega show “Boukante Lapawòl” (exchange of words) after Chérizier called into the show twice over several weeks, with a government spokesman telling CPJ that the suspension was because “Radio Mega had lent its airwaves to Chérizier’s ‘propaganda.’” Radio Mega’s owner claims Chérizier called in without prior arrangement. CPJ and SOS Journalists, a Haitian media advocacy group, criticized the government for imposing the penalty without due process. CPJ, *Haitian telecom authority suspends radio show, citing alleged ‘dissemination of propaganda’* (Nov. 26, 2024), <https://cpj.org/2024/11/haitian-telecom-authority-suspends-radio-show-citing-alleged-dissemination-of-propaganda/>; RHI News, *SOS Journalistes désapprouve la suspension de “Boukante Lapawòl” et déplore une décision jugée arbitraire du CONATEL...* (Nov. 25, 2024), <https://www.rhinews.com/actualites/sos-journalistes-desapprouve-la-suspension-de-boukante-lapawol-et-deploire-une-decision-jugee-arbitraire-du-conatel/> (“‘Boukante Lapawòl has never served as a propaganda platform for gangs. Its editorial independence and critical approach to the power in place are its real ‘crimes’ in the eyes of the authorities.’”). Others have “praised the [government’s] decision, calling for stricter measures against those engaging with gangs.” Juhakenson Blaise, *Haitian authorities shut down popular radio show for allegedly promoting gangs*, Haitian Times (Nov. 24, 2024), <https://haitiantimes.com/2024/11/24/haitian-telecommunications-authorities-suspend-a-radio/>.

¹⁸⁹ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 145, 177 (“The country also continues to experience diversion of public funds intended for the provision of basic needs to Haitians and the construction and development of critical infrastructure.”); OHCHR, *Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns* (Sep. 20, 2024) (“Corruption corrodes the system at every level of the hierarchical chain, and in every sector.”); France24, *Haiti PM Conille touts new police chief in fight against violent gangs* (Jun. 21, 2024), <https://www.france24.com/en/americas/20240620-haiti-conille-police-chief-gangs> (up to 30% of civil servants are receiving a salary despite not performing their duties).

¹⁹⁰ Robenson Geffrard, *Corruption Allegations: CPT Observer Members Suggest Creating an Investigation Commission*, Le Nouvelliste (Aug. 12, 2024), <https://lenouvelliste.com/en/article/249667/corruption-allegations-cpt-observer-members-suggest-creating-an-investigation-commission> (“[TPC] [o]bservers Frinel Joseph and Régine Abraham believe that the corruption allegations against these three CPT members ‘could damage the council’s good reputation and potentially erode public trust in its leaders.’”); Charles, *How a bank bribery scandal rocking Haiti threatens U.S.-backed transition to elections* (Aug. 12, 2024); Jean Junior Celestin, *Pierre Espérance on Corruption Scandal: “CPT’s Future in Jeopardy,”* Le Nouvelliste (Aug. 28, 2024), <https://lenouvelliste.com/en/article/249927/pierre-esperance-on-corruption-scandal-cpts-future-in-jeopardy/>; Caribbean

Community (CARICOM), *Statement by the Eminent Persons Group – following the visit to Haiti, 11-16 August 2024* (Aug. 20, 2024), <https://caricom.org/statement-by-the-eminent-persons-group-following-the-visit-to-haiti-11-16-august-2024/> (CARICOM’s Eminent Persons Group noted that “the corrosive impact of the allegations of corruption have contributed to the fragility of the transition process”).

¹⁹¹ Smith Augustin (representing EDE/RED), Louis Gerald Gilles (representing the December 21 Agreement), and Emmanuel Vertilaire (representing *Pitit Desalin*). Augustin and Gilles have direct ties to the PHTK; Vertilaire was included in the TPC thanks to pressure from the PHTK and CARICOM. IJDH, *Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2023 through May 2024* (Jun. 2024), p. 14 (citing sources).

¹⁹² Augustin, Gilles, and Vertilaire are accused of soliciting \$760,000 from the then-chairman of the Banque Nationale de Credit in exchange for allowing him to retain his position as chairman of the bank. BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶¶ 5-7; Dánica Coto, *Investigators in Haiti accuse three members of transitional presidential council of corruption*, AP News (Oct. 2, 2024), <https://apnews.com/article/haiti-corruption-council-bank-902994c1b5d43865a3e220bf4093e45a> (“The three council members and the bank manager all face criminal charges of bribery and corruption. . . . A judge is now expected to review the report’s findings and issue any arrest warrants if needed.”). See also RHI News, *Un bras droit de Louis Gérald Gilles accusé d’harceler des directeurs généraux pour lui verser de l’argent en échange du maintien de leurs postes dans l’administration publique...* (Aug. 13, 2024), <https://www.rhinews.com/actualites/un-bras-droit-de-louis-gerald-gilles-accuse-dharceler-des-directeurs-generaux-pour-lui-verser-de-largent-en-echange-du-maintien-de-leurs-postes-dans-ladministration-publique/> (Gilles is separately accused of providing “protection and trust” to his “right-hand man,” Hermance Nelson, who has been involved in a number of corruption scandals, including while acting as a public official).

¹⁹³ ULCC, *Rapport d’enquête conduit par l’ULCC sur les allégations de sollicitation de cent millions de gourdes (100.000.000,00 gdes) par trois membres du Conseil Présidentiel de Transition (CPT)* (Oct. 2, 2024). See also Roberson Alphonse, *Prosecutor Seeks Dean’s Intervention to Appoint Investigating Judge for BNC-CPT-ULCC Case*, Le Nouvelliste (Oct. 16, 2024), <https://lenouvelliste.com/en/article/250925/prosecutor-seeks-deans-intervention-to-appoint-investigating-judge-for-bnc-cpt-ulcc-case>.

¹⁹⁴ Fritz Alphonse Jean (representing the Montana Accord Monitoring Bureau).

¹⁹⁵ Odigène, *Fritz Alphonse Jean and the BSA Are No Longer in Contact* (Nov. 11, 2024).

¹⁹⁶ Roberson Geffrard, *CPT-BNC-ULCC Case: Advisors Gilles and Vertilaire State They Will Not Resign...*, Le Nouvelliste (Oct. 3, 2024), <https://lenouvelliste.com/en/article/250652/cpt-bnc-ulcc-case-advisors-gilles-and-vertilaire-state-they-will-not-resign>. The only material consequence to date appears to be that Augustin, who was slated to take over the rotating TPC presidency from Edgard Leblanc Fils on October 7, was replaced in that role by Leslie Voltaire (representing *Fanmi Lavalas*). BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 7.

¹⁹⁷ The January 30 Collective and the Montana Accord Monitoring Bureau called for the three members to step down in order to preserve the TPC’s credibility, and to allow for an independent inquiry into the allegations. The two non-voting TPC members called for an internal investigation and the adoption of a code of ethics. BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 6; Charles, *How a bank bribery scandal rocking Haiti threatens U.S.-backed transition to elections* (Aug. 12, 2024); RHI News, *Les membres du parti EDE demandent la destitution de Smith Augustin, conseiller-président accuse de corruption* (Jul. 6, 2024), <https://www.rhinews.com/actualites/les-membres-du-parti-edo-demandent-la-destitution-de-smith-augustin-conseiller-president-accuse-de-corruption/>.

¹⁹⁸ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶¶ 172-76 (detailing a UN Panel of Experts investigation into corruption by former senator Rony Célestin); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 41 (“On 2 May, the Secretary-General of the Senate was detained for the alleged mismanagement of parliamentary funds and, on 9 May, a former senator of the Artibonite Department was questioned in connection with the same case.”).

¹⁹⁹ UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 29.

²⁰⁰ Dánica Coto, *Haiti unveils new corruption cases against high-level officials even as impunity persists*, AP News (Sep. 3, 2024), <https://apnews.com/article/haiti-corruption-government-ee8c03d035d0f85c4772ed1ebaa7a1fb>; Jean Junior Celestin, *SNGRS : Une enquête de l’ULCC révèle le détournement de 125 millions de gourdes de carburant*, Le Nouvelliste (Sep. 3, 2024), <https://lenouvelliste.com/article/250023/sngrs-une-enquete-de-lulcc-revele-le-detournement-de-125-millions-de-gourdes-de-carburant> (the National Solid Waste Management Service); RHI News, *Le RNDDH accuse le ministre de la Justice de manipulation de dossiers judiciaires et de favoritisme...* (Aug. 22, 2024) (the Social Welfare Fund); Kervenson Martial, *Struggling for every drop: The water crisis in Port-de-Paix*, Haitian Times (Aug. 12, 2024), <https://haitiantimes.com/2024/08/12/struggling-for-every-drop-the-water-crisis-in-port-de-paix/> (the National Directorate of Drinking Water and Sanitation); RHI News, *André Lafontant Joseph de GRIDE défend les Collectivités Territoriales et l’éducation: « L’Exécutif extorque les fonds »...* (Jul. 27, 2024), <https://www.rhinews.com/actualites/andre-lafontant-joseph-du-gride-defend-les-collectivites-territoriales-et-leducation-lexecutif-extorque-les-fonds/> (the Territorial Communities Management and Development Fund and the National Education Fund); Roberson Alphonse, *PM Garry Conille Demands Investigation into BMAPAD’s Fuel Procurement Over “Corruption Suspicions,”* Le Nouvelliste (Jul. 25, 2024), <https://lenouvelliste.com/en/article/249348/pm-garry-conille-demands-investigation-into-bmpads-fuel-procurement-over-corruption-suspicions> (the Bureau of Monetization and Public Aid); BINUH, *Quarterly report on the human rights situation in Haiti* (April-June 2024), p. 9 (the Customs Office). See also Michelson Césaire, *Toussaint Louverture International Airport Still at Risk Despite Resumed House Demolitions*, Le Nouvelliste (Nov. 11, 2024), <https://lenouvelliste.com/en/article/251377/toussaint-louverture-international-airport-still-at-risk-despite-resumed-house-demolitions> (reporting a possible corruption scandal in the mayor’s office in Tabarre, related to the expropriation of houses around Toussaint Louverture Airport).

²⁰¹ Jean Daniel Sénat, *L'ULCC recommande des poursuites contre 13 diplomates haïtiens pour défaut de déclaration de patrimoine*, Le Nouvelliste (Sep. 3, 2024), <https://lenouvelliste.com/article/250033/lulcc-recommande-des-poursuites-contre-13-diplomates-haitiens-pour-defaut-de-declaration-de-patrimoine>; @Radio_Metronome, X (Jun. 26, 2024), https://x.com/Radio_Metronome/status/1805909431000973567 (“[t]he Minister of Foreign Affairs and Worship has recalled more than 80 Haitian diplomats,” including for acts of alleged corruption).

²⁰² The ULCC has initiated multiple investigations into allegations of corruption, including by high-profile government actors, and in September the Ministry of Justice and Public Security and Superior Council of the Judiciary committed to establishing a specialized judicial task force to tackle, *inter alia*, financial crimes. UNSC, *Report of the UN Office on Drugs and Crime* (Oct. 16, 2024), ¶ 39 (on September 3, the ULCC “submitted a request to the Public Prosecutor’s Office to initiate criminal proceedings against 13 former Haitian diplomats for failing to declare their assets as required by law” and “submitted seven investigation reports that detailed potential offenses including bribery, conflict of interest, embezzlement, abuse of function, money-laundering, financial mismanagement and illicit enrichment involving senior officials across various public institutions”); BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 51 (“On 19 September, the Ministry of Justice and Public Security and the Superior Council of the Judiciary, in a gathering with representatives of the national police, departmental delegates and judges, signed a memorandum of understanding to establish specialized judicial task forces . . . to tackle mass crimes, including crimes of sexual violence, as well as financial crimes.”); Michelson Césaire, *Enrichissement illicite : l’ULCC recommande la mise en mouvement de l’action publique contre l’ex-ministre Aviol Fleurant*, Le Nouvelliste (Sep. 3, 2024), <https://lenouvelliste.com/article/250034/enrichissement-illicite-lulcc-recommande-la-mise-en-mouvement-de-laction-publique-contre-lex-ministre-aviol-fleurant>; *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 181 (“At the time of reporting, the country’s anti-corruption unit had prepared 11 high-level cases that were ready for prosecution, involving the diversion of government funds running into millions of United States dollars.”); Le Nouvelliste, *Former Henry Government Ministers Targeted by the ULCC* (Jul. 16, 2024), <https://lenouvelliste.com/en/article/249165/former-henry-government-ministers-targeted-by-the-ulcc>; UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 33.

²⁰³ Roberson Alphonse, *Haitian judiciary delivers second corruption conviction in two decades*, Le Nouvelliste (Nov. 25, 2024), <https://lenouvelliste.com/en/article/251624/haitian-judiciary-delivers-second-corruption-conviction-in-two-decades>; UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 33 (“Overall, marginal progress was made in investigating allegations against public officials during the reporting period.”); OHCHR, *Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns* (Sep. 20, 2024) (“The means [to confront corruption] exist, but they are often misused, a practice encouraged by almost complete impunity.”); Coto, *Haiti unveils new corruption cases against high-level officials even as impunity persists* (Sep. 3, 2024) (despite a recent crackdown on corruption, “Haiti rarely prosecutes government officials”). See also Charles, *How a bank bribery scandal rocking Haiti threatens U.S.-backed transition to elections* (Aug. 12, 2024) (“In a country where high-level officials are rarely prosecuted for corruption despite widespread allegations that government officials use the country’s coffers to enrich themselves, few observers appear surprised by the [corruption] accusations [against the TPC] — or believe that they will lead to criminal charges.”). See also Roberson Geffard, *Who Oversees the Presidential Council and Transitional Government?*, Le Nouvelliste (Jun. 27, 2024), <https://lenouvelliste.com/en/article/248863/who-oversees-the-presidential-council-and-transitional-government> (“Prime Minister Garry Conille promised to implement a strategy to combat corruption in public administration. . . . [and] appointed and installed Marie Chantale Dumay as the minister responsible for cleaning up state institutions, fighting corruption, and combating impunity. However, it remains questionable whether a minister without a portfolio can effectively oversee the actions of the executive.”).

²⁰⁴ Invité.e, *The Fight For Haiti: A Documentary on the Petrocaribe Movement*, Ayibo Post (Nov. 10, 2024), <https://ayibopost.com/opinion-the-fight-for-haiti/>.

²⁰⁵ See Charles, *More than 100 suspected gang members have been killed as vigilantism grows in Haiti* (Nov. 25, 2024); RHI News, *Création d’une Commission Vérité, Justice et Réparation en Haïti : Sa mission consiste à documenter les crimes commis par les gangs pour formuler des recommandations au gouvernement...* (Sep. 8, 2024); Jean-Michel Hauteville, *Haiti’s justice system powerless to deal with gangs*, Le Monde (Aug. 14, 2024), https://www.lemonde.fr/en/international/article/2024/08/17/haiti-s-justice-system-powerless-to-deal-with-gangs_6717483_4.html.

²⁰⁶ See generally BAI et al., *Justice Sector Challenges in Haiti* (Dec. 2021), https://ijdh.org/wp-content/uploads/2021/12/Updated-Justice-Sector-Challenges-in-Haiti_UPR-Submission_EN-1.pdf.

²⁰⁷ See notes 212-14 and associated text.

²⁰⁸ See notes 221-24 and associated text.

²⁰⁹ RHI News, *Création d’une Commission Vérité, Justice et Réparation en Haïti : Sa mission consiste à documenter les crimes commis par les gangs pour formuler des recommandations au gouvernement...* (Sep. 8, 2024); Hauteville, *Haiti’s justice system powerless to deal with gangs* (Aug. 14, 2024); Juhakenson Blaise, *Haitian judge revives memories of La Saline massacre with criminal charges*, Haitian Times (Aug. 14, 2024), <https://haitiantimes.com/2024/08/14/judge-revives-memories-of-la-saline-massacre-with-indictments-2/>.

²¹⁰ See Section IV (Inhumane prison conditions).

²¹¹ IJDH, *Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2023 through May 2024* (Jun. 2024), note 214 and associated text. See also Multinational Security Support Mission (MSS), *Directive on detention, searches and use of force for members of the MSS* (Jun. 2024), https://drive.google.com/file/d/1JCXk2zf-hwLaaeYBzEa_00ByvApyH8X5/view?usp=sharing.

²¹² RNDDH, *Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es.*, ¶ 45 (Nov. 7, 2024), https://web.rnddh.org/wp-content/uploads/2024/11/7-Rap-Justice-2023-2024-Prisons-07Nov2024.FR_.pdf; AlterPresse, *Haïti-Justice : L’Ocnh s’inquiète de la poursuite de la grève*

des magistrats debout (Jul. 11, 2024), <https://www.alterpresse.org/spip.php?article30667>; Hauteville, [Haiti's justice system powerless to deal with gangs](#) (Aug. 14, 2024); Fenel Pélissier, *The legal profession is dying in Port-au-Prince*, Ayibo Post (Jul. 1, 2024), <https://ayibopost.com/the-legal-profession-is-dying-in-port-au-prince/> (“Already ailing, the courts are hardly functional in the Port-au-Prince jurisdiction since the last armed gang assault on February 29, 2024.”); BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 33.

²¹³ These include, in the West Department, the Peace Courts in the north and south sections of Port-au-Prince, Carrefour, Gressier, Tabarre, Thomazeau, Croix-des-Bouquets, Ganthier, Cabaret, and Delmas, and the Courts of First Instance of Port-au-Prince and Croix-des-Bouquets; and in the Artibonite Department, the Peace Courts in L’Estère, Liancourt, and Petite Rivière. RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), ¶¶ 46-49, 54, 60-62.

²¹⁴ BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 29.

²¹⁵ UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶¶ 17, 36; Edxon Francisque, *Fort-Liberté bar demands accountability as land disputes turn deadly for prominent lawyer*, Haitian Times (Sep. 24, 2024), <https://haitiantimes.com/2024/09/24/lawyer-artiste-remy-killed-over-land-conflict-in-ouanaminthe/> (the Secretary General of the Fort-Liberté Bar Association was killed by unidentified assailants on September 16 in Ouanaminthe after receiving multiple threats, allegedly due to his involvement in a land dispute – “[l]awyers, bailiffs, and others involved in these cases have increasingly found themselves the targets of threats and attacks as they navigate a fractured legal landscape, where resolving land ownership disputes can trigger dangerous repercussions”); RNDDH, [Murders, Rapes, Looting, and Arson in Carrefour and Gressier Under the Indifferent Gaze of the New State Authorities](#) (Aug. 15, 2024), ¶ 93 (armed groups “looted and burned. . . . the house of the presiding judge of the Gressier Peace Court, Pierre Miven NORDE, and the house of substitute magistrate Ecelyne Boyard”); Charles, [Haiti prime minister asks police, army and Kenya forces to target gang areas](#) (Jul. 18, 2024); Le Nouvelliste, *The turmoil of current events* (Jul. 17, 2024), <https://lenouvelliste.com/article/249192/les-remous-de-lactualite> (reporting on intimidation of the court by supporters of public prosecutor Ronald Richemond, who was being questioned in relation to his involvement in the 2022 murder of journalist Garry Tesse); BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶¶ 30, 35 (“In April and May, at least four law officers and lawyers were killed and another kidnapped in the Artibonite and North Departments.”). See also GI-TOC, [Will the Artibonite massacre be a turning point in Haiti?](#) (Oct. 9, 2024) (“The assassination of several judges and lawyers, in April and May 2024, also illustrates the involvement of criminal groups in political violence, and their desire to directly influence institutional life not only through their political patrons but also through the elimination of key stakeholders.”).

²¹⁶ RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), ¶¶ 55-58; RHI News, [Création d’une Commission Vérité, Justice et Réparation en Haïti : Sa mission consiste à documenter les crimes commis par les gangs pour formuler des recommandations au gouvernement...](#) (Sep. 8, 2024) (“Underfunded magistrates and neglected courts struggle to conduct investigations, which rarely result in fair trials.”); Blaise, [Haitian judge revives memories of La Saline massacre with criminal charges](#) (Aug. 14, 2024); Hauteville, [Haiti's justice system powerless to deal with gangs](#) (Aug. 14, 2024).

²¹⁷ Hauteville, [Haiti's justice system powerless to deal with gangs](#) (Aug. 14, 2024).

²¹⁸ RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), ¶¶ 55-58 (describing a lack of critical equipment, including computers, and power outages in multiple courthouses); Hauteville, [Haiti's justice system powerless to deal with gangs](#) (Aug. 14, 2024) (reporting that the state budget for the justice sector is “used solely for the payment of civil servants[’s salaries]”).

²¹⁹ The National Association of Haitian Court Clerks was on strike for six months until June 10. The Collective of Standing Magistrates then called for a strike on June 19, before suspending it on August 19 in response to certain concessions from the Minister of Justice. BINUH, [Quarterly report on the human rights situation in Haïti](#) (April-June 2024), p. 9; RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), ¶¶ 6-7; AlterPresse, [Haïti-Justice : L’Ocnh s’inquiète de la poursuite de la grève des magistrats debout](#) (Jul. 11, 2024); RHI News, [Les magistrats haïtiens exigent des traitements équitables : Une menace de grève en perspective ...](#) (Jun. 20, 2024), <https://www.rhinews.com/actualites/les-magistrats-haitiens-exigent-des-traitements-équitables-une-menace-de- greve-en-perspective/>.

²²⁰ Pélissier, [The legal profession is dying in Port-au-Prince](#) (Jul. 1, 2024) (according to a confidential report from the Haitian Bar Federation, Haiti’s courts operated for just 205 days from October 2016 to September 2020, with strikes playing a prominent role in the dysfunction); Jean Junior Celestin, *The Justice Ministry Urges Magistrates to End Their Strike*, Le Nouvelliste (Aug. 1, 2024), <https://lenouvelliste.com/en/article/249458/the-justice-ministry-urges-magistrates-to-end-their-strike>; RHI News, [CADDHO exhorte au dialogue pour éviter une nouvelle grève des magistrats en Haïti ...](#) (Jun. 20, 2024), <https://www.rhinews.com/actualites/caddho-exhorte-au-dialogue-pour-eviter-une-nouvelle- greve-des-magistrats-en-haiti/>.

²²¹ OHCHR, [Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns](#) (Sep. 20, 2024) (“Corruption corrodes the system at every level of the hierarchical chain, and in every sector, first and foremost the justice system.”); RHI News, [Création d’une Commission Vérité, Justice et Réparation en Haïti : Sa mission consiste à documenter les crimes commis par les gangs pour formuler des recommandations au gouvernement...](#) (Sep. 8, 2024) (investigations in Haiti’s justice system, which is “riddled with corruption, . . . rarely result in fair trials”); Blaise, [Haitian judge revives memories of La Saline massacre with criminal charges](#) (Aug. 14, 2024) (“Corruption is pervasive, with many law enforcement officials and judicial personnel susceptible to bribery and political influence, which undermines the rule of law.”). See also note 168.

²²² Hercule was replaced as Minister of Justice by Patrick Pélissier after the TPC replaced interim Prime Minister Conille with Mr. Fils-Aimé. Juhakenson Blaise, *Meet Haiti's new cabinet: the key players shaping the transition under Fils-Aimé*, Haitian Times (Nov. 19, 2024), <https://haitiantimes.com/2024/11/19/haitis-new-cabinet-fils-aime/>.

²²³ Press Lakay, *Haiti: Garry Conille garde confiance en son ministre de la Justice malgré les accusations de trafic d'influence* (Sep. 9, 2024), <https://presslakay.net/haiti-garry-conille-garde-confiance-en-son-ministre-de-la-justice-malgre-les-accusations-de-traffic-dinfluence/>; RHI News, *Le RNDDH accuse le ministre de la Justice de manipulation de dossiers judiciaires et de favoritisme...* (Aug. 22, 2024). See also RNDDH, *Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es* (Nov. 7, 2024), ¶¶ 17-18 (reporting long-standing corruption by the former Port-au-Prince prosecutor, who was replaced in July). See also note 178.

²²⁴ Prominent examples include armed group leader Jimmy Chérizier and former government officials Fednel Monchery and Joseph Pierre Richard Duplan, all of whom remain free despite having been charged for their involvement in the 2018 La Saline massacre. See notes 235-37 and associated text.

²²⁵ Charles, *More than 100 suspected gang members have been killed as vigilantism grows in Haiti* (Nov. 25, 2024) (RNDDH Executive Director Pierre Espérance says, ““The police who want to work are frustrated because when they arrest gang members, the justice system releases them or they [the police] get arrested because there are gang leaders they should not go after.””); RHI News, *Le RNDDH accuse le ministre de la Justice de manipulation de dossiers judiciaires et de favoritisme...* (Aug. 22, 2024). See also GI-TOC, *Will the Artibonite massacre be a turning point in Haiti?* (Oct. 9, 2024) (noting “the record of impunity for Haiti’s gang bosses and their political sponsors”).

²²⁶ RHI News, *Création d’une Commission Vérité, Justice et Réparation en Haïti : Sa mission consiste à documenter les crimes commis par les gangs pour formuler des recommandations au gouvernement...* (Sep. 8, 2024); Hauteville, *Haiti’s justice system powerless to deal with gangs* (Aug. 14, 2024); Blaise, *Haitian judge revives memories of La Saline massacre with criminal charges* (Aug. 14, 2024). See also AlterPress, *Haïti : Mutisme de la justice, 30 ans après l’assassinat du prêtre engagé Jean-Marie Vincent* (Aug. 27, 2024), <https://www.alterpresse.org/spip.php?article30839> (reporting on the 30-year-long impunity for the assassination of a Catholic priest, despite persistent calls for justice); AlterPresse, *Haïti-Justice : L’Ocnh s’inquiète de la poursuite de la grève des magistrats debout* (Jul. 11, 2024) (discussing impunity for perpetrators of sexual violence).

²²⁷ Over three years after the assassination of former President Jovenel Moïse on July 7, 2021, the Haitian investigation into his murder remains ineffectual and hampered by judicial dysfunction. Jacqueline Charles & Jaw Weaver, *Moïse’s rivals recruited Haiti’s gangs in deadly plot 3 years ago. Did they play a role?*, Miami Herald (Jul. 8, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article289802109.html> (“Three years after the brazen assault, Haitians are no closer to learning the full extent of the complicated web of plots driving the killing of Haiti’s president and all who may have played a role.”); RHI News, *“Trois ans après l’assassinat de Jovenel Moïse, la justice haïtienne toujours en quête de vérité”-CARDH...* (Jul. 8, 2024), <https://www.rhinews.com/actualites/trois-ans-apres-lassassinat-de-jovenel-moise-la-justice-haitienne-toujours-en-quete-de-verite-cardh/>; RHI News, *Pierre Espérance préoccupé par l’absence de procès en Haïti concernant l’assassinat de Jovenel Moïse...* (Jul. 7, 2024), <https://www.rhinews.com/actualites/pierre-esperance-preoccupe-par-labsence-de-proces-en-haiti-concernant-lassassinat-de-jovenel-moise/> (RNDDH’s Executive Director Pierre Espérance “points out that the case has been stalled for three years due to the many obstacles encountered in the judicial and police investigations. . . . illustrat[ing] the extent of the plot that led to the assassination of President Jovenel Moïse.”); Gazette Haiti, *Affaire Moïse: le parquet demande à la cour d’appel d’infirmier l’ordonnance en ce qui concerne Claude Joseph, Marky Kessa, Ardouin Zephirin et Laguel Civil* (Oct. 24, 2024), <https://www.gazettehaiti.com/node/11408> (the public prosecutor’s office has asked a court of appeals to overturn the charges against 27 of the 51 individuals named in the investigating judge’s February order, on the basis that the order did not sufficiently substantiate their involvement in the assassination).

²²⁸ Dorval was shot and killed outside his home hours after he had publicly denounced the PHTK government’s management of the country. BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 50; Roberson Alphonse, *Murder of Me Monferrier Dorval: a new judge steps aside*, Canada-Haiti Information Project (Dec. 5, 2023), <https://canada-haiti.ca/content/murder-me-monferrier-dorval-new-judge-steps-aside>.

²²⁹ Unidentified individuals shot and killed journalist Diego Charles and political activist Antoinette Duclair on June 29, 2021. Three years later, the judge assigned to the case has not taken any investigative action. @Radio_Metronome, X (Jun. 29, 2024), https://x.com/Radio_Metronome/status/1807129294444843118.

²³⁰ Tesse was found dead, his body mutilated, on October 24, 2022, several weeks after he accused a public prosecutor and political appointee of plotting his murder. Despite repeated calls by journalists for the government to hold the perpetrator(s) accountable, impunity persists. RHI News, *SOS Journalistes dénonce l’impunité et appelle le Gouvernement Conille à réagir dans l’affaire Garry Tesse...* (Aug. 14, 2024); Le Nouvelliste, *The turmoil of current events* (Jul. 17, 2024); AlterPresse, *Haïti-Affaire Garry Tess : L’organisation SOS journalistes condamne la libération du suspect Wilkens Thirogène sur une fausse ordonnance du parquet des Cayes* (Jan. 4, 2024), <https://www.alterpresse.org/spip.php?article29971>; David C. Adams, ‘Powerful enemies’: Did a prosecutor order the murder of Haitian journalist Garry Tesse?, CPJ (Mar. 26, 2024), <https://cpj.org/2024/03/powerful-enemies-did-a-prosecutor-order-the-murder-of-haitian-journalist-garry-tesse/>.

²³¹ Jeudy, the president of the LGBTQI+ advocacy organization Kouraj, was found dead in his home on November 25, 2019. HRW, *Haiti: Events of 2022* (2023), <https://www.hrw.org/world-report/2023/country-chapters/haiti>.

²³² Invité.e, *The Fight For Haiti: A Documentary on the Petrocaribe Movement* (Nov. 10, 2024).

²³³ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 50 (“[N]o progress was made in the other emblematic cases of the 2017 Grand Ravine and the 2019 Bel Air massacres . . . nor on any mass killing committed since 2021.”); RNDDH, *Murders, Rapes, Looting, and Arson in Carrefour and Gressier Under the Indifferent Gaze of the New State Authorities* (Aug. 15, 2024); Jul. 13, 2024, *Remembering gang terror victims in rural Haiti’s Terre-Neuve and Gros-Morne*, Haitian Times (Jul. 13, 2024), <https://haitiantimes.com/2024/07/13/remembering-gang-terror-victims-in-rural-haitis-terre-neuve-and-gros-morne-vignette/> (noting the lack of justice for victims of massacres in Terre-Neuve and Gros-Morne). See also GI-TOC, *Will the Artibonite massacre be a turning point in Haiti?* (Oct. 9, 2024) (“[I]n a country plagued by impunity, and with the police and the Kenyan-led Multinational Security Support Mission (MSS) still underfunded, understaffed and ill-equipped to deal with the current crisis, there is a substantial risk that the [Pont-Sondé massacre] atrocity will go unpunished.”); RNDDH, *Massacre at Pont-Sondé :*

[National Human Rights Defense Network \(RNDDH\) Demands Immediate Protection of the Population from State Authorities](#) (Oct. 4, 2024), ¶ 14 (“[S]ince the Presidential Transition Council (CPT) led by Edgard LEBLANC Films was formed five (5) months ago, and the government led by Garry CONILLE three (3) months ago, no measures have been taken to retake control of gang-occupied areas, disarm the gangs, arrest them, bring them to justice, and convict them in proportion to their crimes.”).

²³⁴ See note 305 and associated text.

²³⁵ Chérizier, Monchery, and Duplan planned and provided resources for the massacre, during which armed groups led by Chérizier killed at least 71 people, raped at least 11 women, and looted and destroyed at least 150 homes in the La Saline neighborhood in Port-au-Prince. Harvard Law School International Human Rights Clinic & Observatoire Haïtien des crimes contre l’humanité, *Killing with Impunity: State-Sanctioned Massacres in Haiti* (Apr. 2021), https://hrp.law.harvard.edu/wpcontent/uploads/2022/10/Killing_With_Impunity-1.pdf.

²³⁶ Tribunal de Première Instance de Port-au-Prince, *Ordonnance Massacre La Saline* (Jul. 2024), https://drive.google.com/file/d/11Mbi5-cP_DtfoL2vccy9osRKL_emnA8o/view.

²³⁷ See Al Jazeera, [Haitian authorities say 28 alleged gang members killed by police, residents](#) (Nov. 19, 2024).

²³⁸ See David Alire Garcia, *What’s behind the escalating violence in Haiti?*, Reuters (Oct. 5, 2024), <https://www.reuters.com/world/americas/after-haiti-suffers-fresh-gang-massacre-whats-behind-escalating-violence-2024-10-05/> (referring to Chérizier as “[O]ne of the country’s highest-profile gangsters”); Blaise, [Haitian judge revives memories of La Saline massacre with criminal charges](#) (Aug. 14, 2024) (“Chérizier and other gang leaders, who have been indicted as principal actors in the attack, remain in control of most of Port-au-Prince.”).

²³⁹ Fundamental problems with the CVJR’s composition also raise concerns about its ability to deliver justice. See note 17.

²⁴⁰ The Haitian government has still not complied with the May 6, 2008 Inter-American Court of Human Rights order requiring it to develop within two years a Plan of Action to bring Haiti’s prison conditions up to the minimum international human rights standards. Nor has the government complied with the Inter-American Court’s order to publish its May 6 decision and compensate Yvon Neptune, the plaintiff in the case, for his mistreatment as a political prisoner. Inter-American Court of Human Rights, *Case of Yvon Neptune v. Haiti, Judgment of May 6, 2008* (2008), https://www.corteidh.or.cr/docs/casos/articulos/seriec_180_ing.pdf.

²⁴¹ OHCHR, [Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns](#) (Sep. 20, 2024) (“[A]t the prison in Les Cayes, there are 853 detainees in a prison with for a total capacity of 200; at the prison in Jérémie, there are 470 detainees for a capacity of 50.”); iciHaiti, *CERMICOL : Critical situation at the Minor Reintegration Center* (Jun. 22, 2024), <https://www.ichaiti.com/en/news-42609-ichaiti-cermicol-critical-situation-at-the-minor-reintegration-center.html> (“Designed to accommodate up to a hundred children, CERMICOL now houses no fewer than 337 inmates, including men, women and children of both sexes.”); RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), ¶ 81.

²⁴² Armed groups attacked the National Penitentiary and the Croix-des-Bouquets prison in March, rendering them non-operational, and later demolished both the Croix-des-Bouquets and Titanyen prisons. IJDH, [Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2023 through May 2024](#) (Jun. 2024), p. 7; [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), Annex 32. See also BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 20 (the Cabaret women’s prison also remains closed due to repeated attacks by armed groups in 2023 and early 2024); BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 28.

²⁴³ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 32. See also Al Jazeera, [Nearly a dozen inmates killed in Haiti prison break](#) (Aug. 17, 2024), <https://www.aljazeera.com/news/2024/8/17/nearly-a-dozen-inmates-killed-in-haiti-prison-break> (“Conditions in Haiti’s prisons are squalid, with many cells filled to close to quadruple their capacity.”).

²⁴⁴ RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), ¶¶ 99-106.

²⁴⁵ OHCHR, [Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns](#) (Sep. 20, 2024); RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), p. 2 (83.92%). See also Péliissier, [The legal profession is dying in Port-au-Prince](#) (Jul. 1, 2024) (noting that some of those in pretrial detention have been detained for over a decade, and attributing the high pretrial detention rate to the general judicial dysfunction); RNDDH, [Traitements cruels, inhumains et dégradants au CERMICOL : Le RNDDH tire la sonnette d’alarme](#), ¶ 13 (Sep. 9, 2024), https://web.rnddh.org/wp-content/uploads/2024/09/1-CP-CERMICOL-09Sept2024.FR_.pdf (“For several years now, the Port-au-Prince Juvenile Court has not been functioning, due to the fact that no juvenile judge has been appointed. As a result, minors whose cases deserve to be heard are simply held in arbitrary preventive detention”).

²⁴⁶ RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), at 2, ¶¶ 88-89, 90-95 (describing inhumane conditions in prisons in Carrefour, Petit-Goâve, Jacmel, Les Cayes, Fort-Liberté I, Fort-Liberté II, Jérémie, and Anse-à-Veau); OHCHR, [Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns](#) (Sep. 20, 2024) (in Les Cayes, detainees “sleep on floors flooded with rainwater and littered with filth”); @Radio_Metronome, X (Sep. 3, 2024), https://x.com/Radio_Metronome/status/1831152699938578587 (“Prisoners in the country’s various prisons are deprived of everything. No food, no drinking water.”); AP News, [Police say 11 inmates killed in shootouts following a breakout from prison in central Haiti](#) (Aug. 16, 2024), <https://apnews.com/article/haiti-prison-break-inmates-escaped-st-marc-1d301dfc91ba93d17807c7631db36b38> (describing “a chronic lack of food and water in prisons across Haiti”); Danise Davide Lejustal, [Health Crisis at Jacmel Civil Prison, Nearly Ten Deaths Reported](#), Le Nouvelliste (Jul. 18, 2024), <https://lenouvelliste.com/en/article/249214/health-crisis-at-jacmel-civil-prison-nearly-ten-deaths-reported> (“Overcrowding, unsanitary conditions, and severe malnutrition have plagued this [Jacmel] prison for years. The inmates live in deplorable

conditions without access to medical care.”); BINUH, [Quarterly report on the human rights situation in Haiti](#) (April-June 2024), p. 10 (“Prison overcrowding and shortages of food, cleaning products and medicines in the country’s prisons continued to affect the inmates’ health. The prisons of Jérémie (Grand’ Anse department) and Petit Goâve (West department) were particularly affected by these shortages.”). *See also* BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶¶ 25, 28 (new prison administration policies have increased food costs, exacerbating the situation).

²⁴⁷ OHCHR, [Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns](#) (Sep. 20, 2024).

²⁴⁸ *See* note 577.

²⁴⁹ RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), ¶ 88.

²⁵⁰ OHCHR, [Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns](#) (Sep. 20, 2024).

²⁵¹ RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), ¶ 89 (“Many inmates suffer from scabies, tuberculosis and urinary tract infections.”); Lejustal, [Health Crisis at Jacmel Civil Prison, Nearly Ten Deaths Reported](#) (Jul. 18, 2024).

²⁵² UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 39.

²⁵³ AP News, [Police say 11 inmates killed in shootouts following a breakout from prison in central Haiti](#) (Aug. 16, 2024).

²⁵⁴ [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 118 (deaths were “due to anaemia, gastrointestinal diseases, tuberculosis and other infectious diseases”). *See also* BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 30 (reporting that 61 incarcerated individuals died from June to October 2024).

²⁵⁵ Armed group attacks forced the relocation of adult detainees to the Reintegration Center for Minors in Conflict with the Law (CERMICOL), which now houses men, women, and children of both sexes, and is at over three times capacity. RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), ¶ 81; iciHaiti, [CERMICOL : Critical situation at the Minor Reintegration Center](#) (Jun. 22, 2024). *See generally* RNDDH, [Traitements cruels, inhumains et dégradants au CERMICOL : Le RNDDH tire la sonnette d’alarme](#) (Sep. 9, 2024).

²⁵⁶ Lucrise Duquereste & Rolph Louis-Jeune, *Minors, girls and prisoners from National Penitentiary forced into shared detention*, Ayibo Post (Jun. 5, 2024), <https://ayibopost.com/the-only-detention-center-in-operation-in-port-au-prince-is-full/>.

²⁵⁷ RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), ¶ 83 (“The boys’ classrooms are now occupied by male detainees, forcing those in charge of the center to set up tents on the CERMICOL courtyard, in order to facilitate the continuation of academic courses for the minors. Twenty-two (22) minors, who have already completed the 3rd cycle of basic education, are now totally idle, with no access to secondary school courses.”); RNDDH, [Traitements cruels, inhumains et dégradants au CERMICOL : Le RNDDH tire la sonnette d’alarme](#) (Sep. 9, 2024), ¶ 7.

²⁵⁸ Jérôme Wendy Norestyl, « *My life as a child member of 5 Segonn in Village de Dieu* », Ayibo Post (Jun. 18, 2024), <https://ayibopost.com/my-life-as-a-child-member-of-5-segonn-in-village-de-dieu/>. *See also* notes 325-28.

²⁵⁹ RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), ¶ 74; Jonasson Odigène, “Carnage” at Saint-Marc Prison: FJKL Condemns Cases of Summary Executions, Le Nouvelliste (Sep. 4, 2024), <https://lenouvelliste.com/en/article/250071/carnage-at-saint-marc-prison-fjkl-condemns-cases-of-summary-executions>.

²⁶⁰ Odigène, “Carnage” at Saint-Marc Prison: FJKL Condemns Cases of Summary Executions (Sep. 4, 2024); Louis Chadrac, *Organizations Urge the Establishment of an “Independent Inquiry Commission” for Saint-Marc Prison Riots*, Le Nouvelliste (Aug. 30, 2024), <https://lenouvelliste.com/en/article/249958/organizations-urge-the-establishment-of-an-independent-inquiry-commission-for-saint-marc-prison-riots> (“The bodies of the deceased prisoners were buried in a mass grave shortly after the incident, without identification and without informing their families. Two weeks later, no report has yet been submitted to the Saint-Marc First Instance Court, according to the court registry, raising suspicions and doubts.”).

²⁶¹ Charles, [Haiti prime minister asks police, army and Kenya forces to target gang areas](#) (Jul. 18, 2024).

²⁶² *See, e.g.*, UNFPA, *Haiti: Snapshot on incidents of gender-based violence (GBV) from January to October 2024* (Nov. 20, 2024), <https://reliefweb.int/report/haiti/haiti-snapshot-sur-les-incidents-de-violences-basees-sur-le-genre-vbg-de-janvier-octobre-2024> (finding that women and girls were 95% of GBV survivors for incidents reported in the period between January and October 2024).

²⁶³ *See* notes 286-90 and associated text.

²⁶⁴ *See* notes 325-28 and associated text.

²⁶⁵ *See* notes 153, 298-304 and associated text.

²⁶⁶ *See, e.g.*, Kuperminc, [Preventing Sexual and Gender-Based Violence in Haiti](#) (Oct. 3, 2024) (“Given [Haiti’s patriarchal society] and the history of violence against women in Haiti, there are long-held societal beliefs about gender norms and roles that are clearly reflected in the ongoing gang violence.”); Solages & Filippova, [What Haiti’s political transition should be doing for Haiti’s women – and isn’t](#) (Sep. 4, 2024) (“Discrimination against women and girls has always been a feature of Haitian society, including as a legacy of abuse towards Black women’s bodies born of colonialism and enslavement. . . . Pervasive patriarchal and discriminatory stereotypes exacerbate. . . . structural barriers through expectations around family roles, gendered activities, and permissive attitudes towards GBV.”); Christopher Hernandez-Roy & Juliana Rubio, *The Gender-Based Violence Crisis in Haiti*,

p. 1, Center for Strategic & International Studies (Sep. 2024), https://csis-website-prod.s3.amazonaws.com/s3fs-public/2024-09/240919_Hernandez-Roy_GBV_Haiti.pdf?VersionId=iOfiZ2woc1_RCoqMhb9.Wq9gkT9wvRSy (“It is also important to recognize that Haiti’s historic rates of GBV are rooted in its history, cultural norms, and social structures, which have perpetuated cycles of violence and discrimination against women and girls.”). See generally BAI, IJDH & Komisyon Fanm Viktim pou Viktim (KOFIV), *Gender-Based Violence in Haiti* (Dec. 2021), https://www.ijdh.org/wp-content/uploads/2021/12/Gender-Based-Violence-in-Haiti_UPR-Submission_EN-1.pdf.

²⁶⁷ See, e.g., Hernandez-Roy & Rubio, *The Gender-Based Violence Crisis in Haiti*, (Sep. 2024), pp. 3-4 (describing the evolution of GBV as a systematic tool of oppression, from Spanish and French colonial rule through the dictatorships of the 20th century and expansion of the influence of armed groups that dominate the current crisis).

²⁶⁸ See, e.g., *Letter from civil society organizations to Mr. Alix Didier Fils-Aimé, Interim Prime Minister, and Mr. Leslie Voltaire, President of the Transitional Presidential Council* (Nov. 25, 2024) (“The policy focus and dedicated leadership necessary to tackle [GBV and other challenges] have been missing. . . . And more literally missing are women in leadership and decision-making positions who are dedicated to advancing the rights of women and girls and safeguarding the transition, and are empowered to do so.”); *Policy Framework for an Effective and Equitable Transition* (Jul. 2024), <https://www.ijdh.org/wp-content/uploads/2024/07/Policy-Framework-for-an-Effective-Transition-Empower-Womens-Participation-FOR-SIGNATURE-7.3-KR-EN-FR.pdf> (“The transitional government is neglecting women’s leadership, women-specific policy considerations, and the priorities of the women’s movement. . . . The lack of any women with a vote on the Presidential Transitional Council (TPC) is just one – egregious – example of this pattern.”); Solages & Filippova, *What Haiti’s political transition should be doing for Haiti’s women – and isn’t* (Sep. 4, 2024) (“[E]ven as Haiti’s transitional government and its international partners assert a commitment to restoring a rights-based democracy, their actions are compounding, rather than addressing these harms and violations.”); Kuperminc, *Preventing Sexual and Gender-Based Violence in Haiti* (Oct. 3, 2024); Pascale Solages & Sasha Filippova, *Where are the women?*, Haitian Times (Aug. 7, 2024), <https://haitiantimes.com/2024/08/07/where-are-the-women/> (noting that the Transitional Presidential Council’s inclusion of only one woman with no vote as one example of the pattern of “exclusion of women from decision-making in Haiti’s politics”); Arnoux Descardes, *How to Break the Cycle of Weak Elections in Haiti*, United States Institute of Peace (Jun. 20, 2024), <https://www.usip.org/publications/2024/06/how-break-cycle-weak-elections-haiti> (describing historical exclusion of women from Haitian political establishment and lack of representation of women in the more recent 2016 to 2020 Haitian parliament, which counted only one woman out of 30 members in the Senate and three women out of the 119 members of the Chamber of Deputies); RHI News, *Nou Konsyan Lance un avertissement aux autorités : “Le temps presse pour des actions concrètes !”* . . . (Jun. 24, 2024), <https://www.rhinews.com/actualites/nou-konsyan-lance-un-avertissement-aux-autorites-le-temps-presse-pour-des-actions-concretes/>. See also UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶¶ 25, 49, 54 (finding that “the new Government should take all appropriate measures to encourage the enhanced participation of women in public life” and urging “specific steps to increase women’s participation and leadership in political and public life, as well as to ensure that women’s voices and concerns are adequately represented and considered in public spaces and policies”; and finding that “[s]poradic activities will not be sufficient to tackle this destructive phenomenon [of GBV], which should be addressed through the establishment of a sustainable integrated protection system”); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 43 (“National stakeholders, including civil society groups and women’s organizations, criticized the exclusion of women from the new transitional arrangements, with only one woman in the Transitional Presidential Council, and the exclusion of all women candidates from the shortlist for the position of Prime Minister.”); Jessica Anania & Danielle Saint-Lôt, *Haiti’s Transitional Council Has a Blind Spot*, Foreign Policy (June 19, 2024), <https://foreignpolicy.com/2024/06/19/haiti-transitional-council-women-gang-violence/>. In addition to exclusion from high level positions in government, women remain marginalized in decision-making and leadership more generally. See, e.g., note 291 (discussing women’s low involvement in displacement camp management).

²⁶⁹ See, e.g., Haiti Const., Preamble, Arts., 17, 31. Article 276-2 of Haiti’s Constitution further makes the women’s rights obligations under the [Convention on the Elimination of Discrimination Against Women](#) the law of the land. For more extensive discussion, see, e.g., *Policy Framework for an Effective and Equitable Transition* (Nov. 26, 2024); Kuperminc, *Preventing Sexual and Gender-Based Violence in Haiti* (Oct. 3, 2024).

²⁷⁰ In July, feminist and human rights organizations from Haiti and around the world issued a Policy Framework for an Effective and Equitable Transition that identifies existing laws and practices for safeguarding women’s rights in Haiti and demands immediate corrective action to amend policies and programs affecting Haiti accordingly. *Policy Framework for an Effective and Equitable Transition* (Nov. 26, 2024). The Framework has been endorsed by over 170 organizations at the time of writing and widely shared with members of Haiti’s transitional government and Haiti’s international partners. *Organizations Endorsing Policy Framework for an Effective & Equitable Transition*, https://docs.google.com/document/d/1z9fUBW-LLl6QIEat_0YrDNv9wxeiZEqN_-PJaYKvzo8/edit?tab=t.0 (last visited Dec. 5, 2024). On November 25, an Open Letter to the transitional government was sent by 55 of the endorsing organizations demanding immediate action to address rampant GBV and center the needs of women and girls in its policies and programs. *Letter from civil society organizations to Mr. Alix Didier Fils-Aimé, Interim Prime Minister, and Mr. Leslie Voltaire, President of the Transitional Presidential Council* (Nov. 25, 2024).

²⁷¹ Occasional related government activities like a TPC statement calling for mobilization to guarantee effective protections issued in connection with the International Day for the Elimination of Violence against Women and Girls do not appear to be accompanied by meaningful action and serve to underscore government absences rather than to indicate constructive engagement. Cf. AlterPresse, *Le Cpt appelle à une mobilisation nationale pour protéger les femmes et les filles en Haïti* (Nov. 25), <https://www.alterpresse.org/spip.php?article31162>.

²⁷² *Letter from civil society organizations to Mr. Alix Didier Fils-Aimé, Interim Prime Minister, and Mr. Leslie Voltaire, President of the Transitional Presidential Council* (Nov. 25, 2024); *Policy Framework for an Effective and Equitable Transition* (Nov. 26, 2024); Kuperminc, *Preventing Sexual and Gender-Based Violence in Haiti* (Oct. 3, 2024); Anania & Saint-Lôt, *Haiti’s Transitional Council Has a Blind Spot* (Jun. 19, 2024) (“Excluding women from leadership roles thus deprives Haiti’s transition of crucial expertise. . . . Women’s expertise will be an asset to achieving a just political transition and security for all Haitians, in addition to furthering the specific needs of women and girls. Cross-national research finds that women’s inclusion in peace

negotiations strengthens the durability and quality of agreements reached, while greater gender equality is associated with more resilient democracies.”).

²⁷³ HRW, *Haiti: Scarce Protection as Sexual Violence Escalates* (Nov. 25, 2024); GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 2* (Nov. 2024); BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 49; UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶¶ 16, 38; UN Women, *Haiti: Displaced women face ‘unprecedented’ level of insecurity and sexual violence* (July 17, 2024), <https://news.un.org/en/story/2024/07/1152206>; BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 38; OHCHR, *Haiti: Soaring number of displaced desperately need protection and aid priority, UN experts urge* (Jun. 20, 2024), <https://www.ohchr.org/en/press-releases/2024/06/haiti-soaring-number-displaced-desperately-need-protection-and-aid-priority>.

²⁷⁴ BINUH, *Quarterly report on the human rights situation in Haiti* (April-June 2024), p. 7.

²⁷⁵ UNFPA, *Haiti Situation Report #6 – 19 August 2024* (Aug. 2024), p. 2.

²⁷⁶ OCHA, *Haiti Emergency Situation Report No. 23 (As of 16 May 2024)* (May 16, 2024), <https://www.unocha.org/publications/report/haiti/haiti-emergency-situation-report-no-23-16-may-2024> (reporting an increase in GBV cases “between the first two months of the year and March, rising from 250 to 1,543” with sexual violence accounting for 75% or almost 4,000 of the incidents); UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 15. This is a continuation of a sharp upwards trend throughout the crisis, with an almost 50% increase in reported cases between 2022 and 2023. UNFPA, *The situation of gender-based violence in Haiti*, at 0:52 (Dec. 2023), <https://www.youtube.com/watch?v=90t4XA3gdls&t=62s>. See also Kuperminc, *Preventing Sexual and Gender-Based Violence in Haiti* (Oct. 3, 2024) (summarizing UNFPA findings as showing that “5,587 cases of SBGV were reported in 2023, a 50% increase from 2022 figures – and the numbers do not tell the full story of the full brutality and intensity of these crimes”).

²⁷⁷ UNFPA, *Haiti: Snapshot on incidents of gender-based violence (GBV) from January to October 2024* (Nov. 20, 2024) (“From July to date [October 2024], the number of reports has decreased to 1162. It should be noted that the reports do not represent the magnitude of actual GBV cases, as these numbers depend on survivor self-reporting.”).

²⁷⁸ See Section II.

²⁷⁹ Office of the Special Representative of the Secretary-General for Children and Armed Conflict, *Haiti: Persistent, Brutal Crisis Having Devastating Impact on Children* (Nov. 12, 2024), <https://childrenandarmedconflict.un.org/2024/11/haiti-persistent-brutal-crisis-having-devastating-impact-on-children/>.

²⁸⁰ See, e.g., UNFPA, *Haiti: Snapshot on incidents of gender-based violence (GBV) from January to October 2024* (Nov. 20, 2024) (noting that the reported numbers of GBV cases do not represent the true incidence because these numbers depend on self-reporting); BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 49; BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 38; UNFPA, “No one is spared”: *Sexual violence wielded as a weapon in Haiti’s humanitarian crisis* (June 26, 2024), <https://www.unfpa.org/news/%E2%80%9Cno-one-spared%E2%80%9D-sexual-violence-wielded-weapon-haiti%E2%80%99s-humanitarian-crisis> (describing reports from a psychologist at Petite Place Cazeau hospital in Port-au-Prince regarding the “vast underrepresentation of the true scale of [GBV-related] crimes,” in part due to victims’ fears that reporting will lead to re-victimization). See also Kuperminc, *Preventing Sexual and Gender-Based Violence in Haiti* (Oct. 3, 2024) (“Survivors, witnesses, and officials face the threat of reprisals if they report, or act upon reports.”); GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 2* (Nov. 2024), p. 13 (“According to several humanitarian sources consulted in Port-au-Prince, victims under-report instances of sexual violence, as they often fear retaliation or lack trust in the justice system, which is weakened by attacks on justice personnel and a minimal police presence. Underreporting also indicates a form of social violence that perpetuates control even after the initial attack, and affects mental and physical health.”); Hernandez-Roy & Rubio, *The Gender-Based Violence Crisis in Haiti* (Sep. 2024), p. 6 (“Accurately determining the rate of increase in sexual violence in Haiti is challenging due to several factors: the absence of government institutions, gang control over many affected areas, victims’ inability to report incidents, a lack of consistent reporting and data collection mechanisms, ongoing stigma around such cases, and a history of repercussions for those who come forward.”).

²⁸¹ See, e.g., HRW, *Haiti: Scarce Protection as Sexual Violence Escalates* (Nov. 25, 2024); GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 2* (Nov. 2024), p. 13 (“The impact of GBV on the community is profound, as pervasive fear and trauma disrupt social cohesion, hinder economic activities and perpetuate a cycle of violence and instability.”); UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶¶ 16, 38; BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 38; UNFPA, “No one is spared”: *Sexual violence wielded as a weapon in Haiti’s humanitarian crisis* (Jun. 26, 2024) (“For women and girls, [extreme violence in Port-au-Prince] is a battle being waged against their bodies, as sexual violence is used by gangs as a tactic to instill fear and seize control of entire neighbourhoods.”); OHCHR, *Haiti: Soaring number of displaced desperately need protection and aid priority, UN experts urge* (Jun. 20, 2024) (“[S]exual violence against women and girls at IDP sites is surging as gangs use rape as a weapon of terror.”); Hernandez-Roy & Rubio, *The Gender-Based Violence Crisis in Haiti*, (Sep. 2024) (“As the political and security crisis in Haiti has deepened in recent years, the use of GBV, particularly sexual violence, has increased as a systematic tool of intimidation and punishment, and ultimately of control.”).

²⁸² See, e.g., UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 22 (describing the collective rape of girls and boys under five years old in sites housing internally displaced persons in Port-au-Prince); BINUH, *Sexual violence in Port-au-Prince: A weapon used by gangs to instill fear*, ¶ 5 (Oct. 2022), <https://www.ohchr.org/sites/default/files/2022-10/20221014-Report-on-Sexual-Violence-haiti-en.pdf> (describing armed groups’ practices of subjecting “children as young as 10 and elderly women” to “collective rapes for hours in front of their parents or children”).

²⁸³ See, e.g., BINUH, *Quarterly report on the human rights situation in Haiti* (April-June 2024), p. 8. See also Kuperminc, *Preventing Sexual and Gender-Based Violence in Haiti* (Oct. 3, 2024) (“In some cases, perpetrators share video recordings of the

sexual violence [of kidnapping victims] with victims' families as a means to secure ransom payment, thus subjecting their hostages to secondary victimization while also targeting their families with a separate form of sexual violence.”).

²⁸⁴ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 49 (describing reports of women who had been “raped inside their residences by several armed individuals during attacks on neighbourhoods, while others were intercepted while walking on the street or travelling in public transport, and others were sexually exploited for months by multiple perpetrators”); [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 124 (describing the prevalence of sexual violence in Haiti, including an incident in December 2023 when members of an armed group stopped a van full of passengers, collectively raped three women in front of the other passengers, and then killed them); UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶¶ 16; 18 (“Women and girls have been intercepted by gangs controlling ‘rival neighbourhoods’ while trying to reach basic services or go to school,” and are at particular “risk of being subjected to sexual violence when trying to pass [armed gang] checkpoints.”). See also Marcia Biggs, André Paultre & Eric O’Connor, *An inside look at how gang warfare in Haiti has devastated daily life*, PBS (Nov. 20, 2024), <https://www.pbs.org/newshour/show/an-inside-look-at-how-gang-warfare-in-haiti-has-devastated-daily-life>.

²⁸⁵ According to OCHA, 78% of survivors in the cases they documented are displaced persons. OCHA, [Haiti Emergency Situation Report No. 23 \(As of 16 May 2024\)](#) (May 16, 2024). While this clearly indicates greater vulnerability to GBV, including as a reflection of displacement being a consequence of armed group violence in the first place, it may likewise reflect increased reporting due to responder presence and community survivor support in displacement areas.

²⁸⁶ See, e.g., UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 22 (“During the first quarter of 2024, at least 216 cases of sexual violence, including the collective rape of girls and boys under 5 years old, were reported in sites housing internally displaced persons in the metropolitan area of Port-au-Prince.”); REGAH HAITI, IDEJEN & UN Women, [Addressing Haitian women’s particular needs through their leadership role](#) (Jul. 2024), p. 3 (“Women and girls in IDP camps are highly vulnerable to gender-based violence, including domestic and sexual violence and exploitation.”).

²⁸⁷ See, e.g., REGAH HAITI, IDEJEN & UN Women, [Addressing Haitian women’s particular needs through their leadership role](#) (Jul. 2024), p. 3 (“The camps are devoid of any security features for children, girls, and women. There is no lighting in the bedrooms, toilets (which also have no locks from the inside), or other meeting places frequented at night, which are used by women, girls, boys, and men without adequate privacy. Armed gangs operate daily in the streets and around the camps, with the constant risk of stray bullets being fired at displaced persons.”); UNHCR, [Haiti Factsheet](#) (Jul. 2024) (“76% of sites lack adequate lighting”). See also UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 22 (reporting on heightened risks to IDPs because 75% of displacement sites are located in areas controlled by or highly exposed to armed groups).

²⁸⁸ Rebecca Bruny, *Sexe contre kits : les gangs contrôlent des abris provisoires de Port-au-Prince*, Ayibo Post (Sep. 3, 2024), <https://ayibopost.com/des-gangs-exigent-du-sexe-en-echange-de-laide-humanitaire-dans-des-camps-a-p-au-p/> (describing reports from residents of temporary shelters that armed groups had infiltrated the shelters and were requiring women to exchange sex for access to food and other humanitarian aid kits – women who refused advances were required to pay exorbitant amounts for the kits); REGAH HAITI, IDEJEN & UN Women, [Addressing Haitian women’s particular needs through their leadership role](#) (Jul. 2024), p. 1 (“[A]ggression against women and girls, and more specifically rape, [is] being used in most camps as a deliberate tactic to control women’s access to humanitarian assistance.”).

²⁸⁹ See OCHA, [Haiti Emergency Situation Report No. 23 \(As of 16 May 2024\)](#) (May 16, 2024) (reporting an “alarming” rise in GBV cases, with “more than 70 per cent of incidents . . . reportedly attributable to the perpetrators of attacks”). Note that even as the staggering incidence of GBV reported in this Update is the result of a surge resulting from armed group violence, Haiti – like many countries – has baseline endemic high rates of GBV directed primarily against women and girls that is a reflection of their unequal status in society and chronic unaddressed discrimination in law, policy, and social practice. See, e.g., BAI, IJDH & KOFIV, [Gender-Based Violence in Haiti](#) (Dec. 2021); BAI et al., *Supplemental Submission to the Inter-American Commission on Human Rights Re: Update on Widespread Sexual Violence against Women and Girls in Haiti* (Feb. 26, 2024), <https://www.ijdh.org/wp-content/uploads/2024/03/2023.02.26-IACHR-Supplemental-Submission-COMBINED.pdf>; Kuperminc, [Preventing Sexual and Gender-Based Violence in Haiti](#) (Oct. 3, 2024) (“A patriarchal culture normalizes crimes committed by men against women’s bodies while simultaneously stigmatizing those subjected to such crimes.”).

²⁹⁰ Cf. OCHA, [Haiti Emergency Situation Report No. 23 \(As of 16 May 2024\)](#) (May 16, 2024) (attributing more than 70% of GBV to “perpetrators of attacks”).

²⁹¹ See REGAH HAITI, IDEJEN & UN Women, [Addressing Haitian women’s particular needs through their leadership role](#) (Jul. 2024), p. 4 (In surveys with 98 women in camps for the internally displaced, only 2% reported having a leadership role in camp management, with women reporting that they did not take part because “they feared the men on the management committees could be disrespectful to girls and women and did not believe in women’s abilities to manage the camps”).

²⁹² UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 16 (noting that women and girls “have been forced into exploitative sexual relations with gang members and killed in broad daylight for refusing to do so”); Wilentz, [JD Vance’s Slanders Are Far From the Worst Thing the US Has Done to Haitians](#) (Sep. 11, 2024) (“Women have been attacked both in gang-run areas, where many have been forced into what amounts to sexual servitude and enforced gang participation.”); HRW, [Haiti: Criminal Violence, Hunger Trapping Children](#) (Oct. 9, 2024) (“Group members also abduct girls from their homes, to recruit them into the groups, taking them to criminal leaders’ homes, where they are raped and forced to work.”); [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 124 (describing reports that members of an armed gang killed a 22-year woman by two bullets to her vagina after she refused to have sexual relations with a leader of the group).

²⁹³ HRW, [Haiti: Criminal Violence, Hunger Trapping Children](#) (Oct. 9, 2024) (“More and more families are being forced to hand over their daughters to the gangs,” a local human rights worker said. “They know they will be raped and treated like slaves, but they have to accept it, and in some cases they do it to avoid their daughters being raped or abused by men from other groups”).

or from their own community.”); Kuperminc, [Preventing Sexual and Gender-Based Violence in Haiti](#) (Oct. 3, 2024) (“It is thus not uncommon for women and girls to find themselves coerced – by gangs and by their own family members – into sexual relationships with gang members, with the consent of women and girls rarely given any meaningful consideration. Such arrangements can provide the families with access to certain basic services as well as protection, while refusing or resisting these arrangements increases the likelihood of danger.”).

²⁹⁴ For example, women and girls face heightened risks of being subjected to sexual violence when attempting to pass through the widespread checkpoints manned by armed gangs. See, e.g., UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶¶ 16; 18.

²⁹⁵ UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 16 (describing how women and girls have been “intercepted by gangs” while trying to reach basic services); UNFPA, [“No one is spared”: Sexual violence wielded as a weapon in Haiti’s humanitarian crisis](#) (Jun. 26, 2024) (describing the account of a woman who was kidnapped and raped repeatedly by several members of an armed group while traveling to collect water); HRW, [Haiti: Scarce Protection as Sexual Violence Escalates](#) (Nov. 25, 2024) (describing the report of a woman who was raped by four men while looking for water for her children); Solages, [Six Haitian women’s struggles to recover from rape by gangs](#) (Nov. 19, 2024) (describing women’s experiences of being raped when traveling to collect essential items).

²⁹⁶ BetterWork, [Working in jeopardy: Stories from Haiti’s garment industry](#) (Nov. 12, 2024), <https://betterwork.org/working-in-jeopardy-personal-stories-from-haitis-garment-industry/> (describing the ways violence and insecurity have impacted women’s abilities to work in the country’s garment industry); BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 48 (noting that 61% reduction in formal jobs in Haiti’s garment sector due to insecurity has disproportionately impacted women, who represent 65% of the workforce in the textile industry); Hernandez-Roy & Rubio, [The Gender-Based Violence Crisis in Haiti](#) (Sep. 2024), p. 6 (“The economic roles that Haitian women occupy expose them to heightened risks of GBV. For instance, women who work as vendors in markets or engage in informal trade are often targeted for extortion, harassment, and physical violence, which restricts their ability to earn a living.”). See also note 399.

²⁹⁷ BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 57 (“Rising poverty levels have increased the risks of sexual exploitation and abuse, and of negative coping mechanisms such as transactional sex.”); REGAH HAITI, IDEJEN & UN Women, [Addressing Haitian women’s particular needs through their leadership role](#) (Jul. 2024), p. 4 (noting that 16.2% of women and girls in IDP camps report that they feel they are victims of discrimination and harassment, 10.8% report having to resort to sex work/prostitution to meet their needs at least once, and 20.6% reported knowing someone who has done so); Lucnise Duquereste & Jabin Phontus, [Fuyant l’insécurité à P-au-P, des enfants abusés dans le sud](#), Ayibo Post (Jul. 22, 2024), <https://ayibopost.com/fuyant-linsecurite-a-p-au-p-des-enfants-abuses-dans-le-sud/> (reporting that among women reporting GBV to the Brigade for the Protection of Minors in the South Departmental Directorate of the National Police, “most testify to having been abused by a person ‘providing financial support to the family’”).

²⁹⁸ See, e.g., Kuperminc, [Preventing Sexual and Gender-Based Violence in Haiti](#) (Oct. 3, 2024) (“Survivors, who are often under gang surveillance, face reprisals if they are thought to be coordinating with rival gangs or police. This surveillance, combined with gang-erected checkpoints, severely restricts freedom of movement and further hampers the ability of survivors to access medical and emergency services in safe areas, as health care access within their own neighborhoods continues to deteriorate.”).

²⁹⁹ UNFPA, [Haiti Situation Report #6 – 19 August 2024](#) (Aug. 2024), p. 2.

³⁰⁰ UNFPA, [Haiti Situation Report #8 – November 2024](#) (Nov. 2024), <https://www.unfpa.org/resources/haiti-situation-report-8-november-2024>. OCHA GBV sub-cluster’s prevention and care activities were only 7% funded as of mid-May. OCHA, [Haiti Emergency Situation Report No. 23 \(As of 16 May 2024\)](#) (May 16, 2024). See also notes 574-77.

³⁰¹ PAHO, [Public Health Situation Analysis – Haiti](#), p. 4 (Oct. 4, 2024), <https://www.paho.org/en/documents/public-health-situation-analysis-haiti-4-octobre-2024>; UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 16; UNFPA, [Haiti Situation Report #6 – 19 August 2024](#) (Aug. 2024), p. 2 (“Access to essential social services, hygiene facilities and psychological assistance is scarce and capacity, especially in the capital, remains extremely limited.”); HRW, [Haiti: Scarce Protection as Sexual Violence Escalates](#) (Nov. 25, 2024); GI-TOC, [Observatory of Violence and Resilience in Haiti: Issue 2](#) (Nov. 2024) (“Access to treatment for GBV survivors is severely limited, exacerbating the physical and psychological trauma they experience.”). See also Solages, [Six Haitian women’s struggles to recover from rape by gangs](#) (Nov. 19, 2024) (offering individual accounts of survivors illustrating extreme difficulties in accessing care for GBV victims). Anecdotally, *Nègès Mawon* has shared that survivors have in some cases been unable to reach their safe house even when beds became available.

³⁰² HRW, [Haiti: Scarce Protection as Sexual Violence Escalates](#) (Nov. 25, 2024) (“Many who seek care often cannot do so within the critical 72-hour window to access post-exposure prophylaxis and emergency contraception, either because many public medical facilities are closed due to the violence, or because they do not have the financial resources to go to private health centers, medical workers said.”).

³⁰³ Jérôme Wendy Norestyl & Widlore Mérancourt, [More and more adolescents living with HIV in Haiti](#), Ayibo Post (Jul. 31, 2024), <https://ayibopost.com/more-and-more-adolescents-living-with-hiv-in-haiti/>; PAHO, [Improving Access to Long-Acting Reversible Contraceptives \(LARCs\): Advancing Reproductive Health in Haiti](#) (Oct. 18, 2024), <https://www.paho.org/en/news/18-10-2024-improving-access-long-acting-reversible-contraceptives-larcs-advancing-reproductive>.

³⁰⁴ See, e.g., UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 16 (“Despite the extraordinary efforts made by civil society organizations, supported by United Nations entities and other international actors, medical and psychological support services for survivors and their families remain largely insufficient.”); HRW, [Haiti: Scarce Protection as Sexual Violence Escalates](#) (Nov. 25, 2024). See also note 153

³⁰⁵ RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), p. 19 (“Sexual assaults continue to be trivialized by the

justice system which is very lenient towards sexual predators.”); HRW, [Haiti: Scarce Protection as Sexual Violence Escalates](#) (Nov. 25, 2024); AlterPresse, [Haiti-Justice : L’Ocnh s’inquiète de la poursuite de la grève des magistrats debout](#) (Jul. 11, 2024) (“Survivors of rape and sexual violence who are victims of armed gangs are waiting for justice and reparations. The phenomenon of impunity and the fight against corruption cannot be effectively addressed by a virtually dysfunctional justice system.”); Kuperminc, [Preventing Sexual and Gender-Based Violence in Haiti](#) (Oct. 3, 2024) (describing the deterioration of access to justice in Haiti, and “significant distrust of law enforcement due to the complicity of some officials in perpetrating [sexual and gender-based violence (SGBV)] and the long history of impunity for SGBV in Haiti”).

³⁰⁶ See Section VI (Access to healthcare).

³⁰⁷ See, e.g., RHI News, [‘Le système de santé de la capitale haïtienne “au bord du gouffre”-ONU...’](#) (Jun. 30, 2024) (“Neonatal, pediatric and nutritional units that are still functioning are overwhelmed, and those still operating in areas controlled by armed groups lack adequate human resources, equipment and medicines to provide essential health and nutrition services. Health facilities have closed or significantly reduced operations as they run out of vital medicines and medical supplies, some of which have been looted,” leaving “around 3,000 pregnant women struggling to access maternal health services.”); Jean Junior Celestin, [No accommodations available for pregnant women from Furcy to downtown](#), *Le Nouvelliste* (Nov. 21, 2024), <https://lenouvelliste.com/en/article/251557/no-accommodations-available-for-pregnant-women-from-furcy-to-downtown> (documenting examples of women and babies dying in childbirth because doctors could not get to hospitals). According to information shared by a network of healthcare organizations operating in Haiti, other specialized care like cervical cancer screenings is also lacking, with a consequent rise in late-stage cancer.

³⁰⁸ Celestin, [No accommodations available for pregnant women from Furcy to downtown](#) (Nov. 21, 2024).

³⁰⁹ PAHO, [Public Health Situation Analysis – Haiti](#) (Oct. 4, 2024), p. 21 (citing shortages of qualified personnel, equipment, and medicines, along with lack of accessibility among causes).

³¹⁰ See PAHO, [Public Health Situation Analysis – Haiti](#) (Oct. 4, 2024), p. 21 (reporting further that “the number of institutional deliveries has been falling sharply since September 2023,” with “barely 42% of women giv[ing] birth under medical assistance”).

³¹¹ See, e.g., HRW, [Haiti: Scarce Protection as Sexual Violence Escalates](#) (Nov. 25, 2024); Haiti Libre, [Haiti - Contraception : Achievements, but much remains to be done](#) (Oct. 10, 2024), <https://www.haitilibre.com/en/news-43388-haiti-contraception-achievements-but-much-remains-to-be-done.html>. See also Solages, [Six Haitian women’s struggles to recover from rape by gangs](#) (Nov. 19, 2024) (sharing personal accounts reflecting hardships from pregnancies resulting from rapes by armed groups, including the account of a girl forced to carry a pregnancy resulting from collective rape to term, ending her schooling).

³¹² There are some reports of children being recruited by self-protection groups. BINUH, [Quarterly report on the human rights situation in Haiti](#) (April-June 2024), p. 8 (reporting that children are “increasingly being used by gangs and ‘self-defense’ groups to commit criminal activities”).

³¹³ UNICEF, [Number of children in Haiti recruited by armed groups soars by 70 per cent in one year](#) (Nov. 24, 2024), <https://www.unicef.org/press-releases/number-children-haiti-recruited-armed-groups-soars-70-cent-one-year-unicef>. See also BINUH, [Haiti: UN human rights expert William O’Neill concludes official visit, laments bleak situation](#) (Sep. 20, 2024) (“Gangs have increasingly trafficked children, forcibly recruited them into gangs, and often used them to carry out attacks against public institutions and police operations. Youth are losing hope of a better future.”); HRW, [Haiti: Criminal Violence, Hunger Trapping Children](#) (Oct. 9, 2024); BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 39 (“[G]angs are trafficking and recruiting more children, and increasing the number of children carrying weapons, likely in anticipation of the deployment of the Multinational Security Support mission.”); Norestyl, [« My life as a child member of 5 Segonn in Village de Dieu »](#) (Jun. 18, 2024).

³¹⁴ OCHA, [Haiti – Advocacy note for the immediate mobilization of resources, August 2024](#) (Aug. 21, 2024); [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶¶ 127-135; UNICEF, [UNICEF Executive Director Catherine Russell briefing to the United Nations Security Council on the humanitarian situation in Haiti](#) (Oct. 22, 2024), <https://www.unicef.org/press-releases/unicef-executive-director-catherine-russell-briefing-united-nations-security-0> (“As armed violence continues to drive the deteriorating conditions across Haiti, the UN has estimated that 30 to 50 per cent of armed group members are children who are subject to coercion, abuse and exploitation stemming from persistent social, economic and political fragility caused by ongoing violence that has spiraled parts of the country into chaos.”). See also Norestyl, [« My life as a child member of 5 Segonn in Village de Dieu »](#) (Jun. 18, 2024) (reporting that children represent 30% to 40% of the total number of members of armed gangs in the country).

³¹⁵ [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), p. 3; HRW, [Haiti: Criminal Violence, Hunger Trapping Children](#) (Oct. 9, 2024); Amnesty International, [Haiti: Oral statement: Item 10: Interactive dialogue with the High Commissioner on interim report on Haiti, with the participation of the human rights expert on Haiti](#) (Oct. 8, 2024), <https://www.amnesty.org/en/documents/amr36/8602/2024/en/> (“Girls as young as 14 told [OHCHR] how multiple gang members repeatedly raped them during attacks on neighborhoods or after abductions. We spoke to children who lost limbs and sustained other catastrophic injuries due to stray bullets or from being targeted.”); Save the Children, [Haiti: Five Children a Week on Average Killed or Injured in Armed Violence in 2024](#) (Aug. 13, 2024), <https://www.savethechildren.net/news/haiti-five-children-week-average-killed-or-injured-armed-violence-2024-save-children> (reporting that as of August 13, 2024, at least 131 children had been reported killed during violent attacks or clashes between armed gangs, although “the true number of child casualties is likely to be much higher.”); BINUH, [Quarterly report on the human rights situation in Haiti](#) (April-June 2024), p. 8 (reporting that at least 49 children were killed because of ongoing violence between April and June 2024, due to gang attacks, stray bullets from police operations, and from being used by gangs and “self-defense” groups to commit criminal activities.); Mohor, Jérôme & Kiage, [Haiti in-depth: Ten key questions as Kenyan police deploy to restore order](#) (Jun. 26, 2024) (reporting on the “horrendous” “toll [of ongoing violence] on children”).

³¹⁶ UNICEF, *Haiti* (Dec. 2024), <https://www.unicef.org/media/165671/file/2025-HAC-Haiti.pdf> (reporting more than 350,000 children displaced). See also IOM, *Haiti — Report on the internal displacement situation in Haiti — Round 8* (Sep. 2024), p. 3 (reporting that as of September 2024, children made up 52% of Haiti’s 702,973 internally displaced persons).

³¹⁷ “Displaced children and adolescents in Haiti are at increased risk of violence, including sexual assault, exploitation and abuse, and family separation. They often face disrupted access to services, such as safe spaces, health care, and clean water and sanitation.” UNICEF, *One child displaced every minute in Haiti as armed violence persists* (Jul. 2, 2024), <https://www.unicef.org/press-releases/one-child-displaced-every-minute-haiti-armed-violence-persists-unicef>. See also Save the Children, *Haiti’s Class Sizes Double as Mental Health Crisis Worsens Among Students* (Sep. 26, 2024), <https://www.savethechildren.org/us/about-us/media-and-news/2024-press-releases/haitis-class-sizes-double-as-mental-health-crisis-worsens> (“Parents and teachers have reported an increase in aggression, withdrawal, and emotional distress among [displaced] students due to prolonged exposure to armed violence, hunger, and uncertainty.”).

³¹⁸ OCHA, *Haiti – Advocacy note for the immediate mobilization of resources. August 2024* (Aug. 21, 2024), p. 8; Global Protection Cluster, *Protection of internally displaced persons in Haiti* (May 2024), p. 5 (“In May 2024, child protection partners identified at least 109 unaccompanied and separated children in IDP sites, including 54 girls. These children are particularly vulnerable to abuse, exploitation, and trafficking.”). Illegal, irresponsible deportations from the Dominican Republic (see notes 485-95) are reportedly contributing to the number of children without their parents. Edxon Francisque, *Outrage Grows in Haiti’s Northeast Over Dominican Republic’s Deportation of Unaccompanied Haitian Children*, *Haitian Times* (Sep. 29, 2024), <https://haitiantimes.com/2024/09/29/haitian-children-expelled-a-dominican-border-without-parents/>.

³¹⁹ See Section VI (Access to education).

³²⁰ REGAH HAITI, IDEJEN & UN Women, *Addressing Haitian women’s particular needs through their leadership role* (Jul. 2024), p. 3. See also Save the Children, *Haiti’s Class Sizes Double as Mental Health Crisis Worsens Among Students – Save the Children* (Sept. 26, 2024) (reporting that over the 2023-2024 school year, more than 900 schools temporarily closed, “affecting about 200,000 children’s access to education.”).

³²¹ BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 58 (noting that as of June 2024, extended school closures remained a concern and risked exacerbating educational disparities, particularly for girls, children with disabilities, and other vulnerable populations).

³²² *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 115 (“One in two Haitian children currently faces acute food insecurity.”). See also HRW, *Haiti: Criminal Violence, Hunger Trapping Children* (Oct. 9, 2024) (reporting that approximately 125,000 children in Haiti face severe acute malnutrition and nearly 3 million children, or half of Haiti’s children, need humanitarian aid.); Integrated Food Security Phase Classification (IPC), *IPC Analysis of Acute Food Insecurity: Haiti*, p. 1 (Sep. 30, 2024), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Haiti_Acute_Food_Insecurity_Aug2024_Jun2025_Report_Fre_nch.pdf (reporting that the Global Acute Malnutrition rate among children aged 6 to 59 months was 24.6% and at least 276,136 children aged 6 to 59 months are expected to suffer from acute malnutrition by the end of 2024.); ACAPS, *Haiti: Impact of conflict on children and youth*, p. 1 (Sep. 30, 2024), https://www.acaps.org/fileadmin/Data_Product/Main_media/20240930_ACAPS_Haiti_-_Impact_of_conflict_on_children_and_youth.pdf (“Severe acute malnutrition among children increased by almost 20% between January-July 2024, with nearly 125,000 Haitian children facing severe acute malnutrition in July.”); Matt Kadosh, *Montclair Doc Opens Second Clinic in Haiti*, *Montclair Local* (Nov. 6, 2024), <https://montclairlocal.news/2024/11/lamp-for-haiti-doc-opens-second-clinic-in-haiti/> (a clinic in Port-au-Prince says 60% of the patients it sees are children, and that “in the last year, the number of patients the clinic has treated for malnutrition has tripled”); OCHA, *Global Humanitarian Overview 2024, Mid-Year Update*, p. 11 (May 31, 2024), <https://www.unocha.org/publications/report/world/global-humanitarian-overview-2024-mid-year-update-snapshot-31-may-2024> (reporting that as of May 2024, 823,000 children and pregnant or lactating women were at severe risk of malnutrition).

³²³ Nour Hammad & Tanya Birkbeck, *World Breastfeeding Week: In Haiti and Gaza, mothers and children in the crosshairs of malnutrition emergencies*, WFP (Aug. 6, 2024), <https://www.wfp.org/stories/world-breastfeeding-week-haiti-and-gaza-mothers-and-children-crosshairs-malnutrition>.

³²⁴ See, e.g., UNICEF, *One child displaced every minute in Haiti as armed violence persists* (Jul. 2, 2024) (“Poor hygiene conditions in camps and makeshift settlements put [children] at increased risk of disease, including cholera...”). See also IJDH, *Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2022 through May 2023*, note 260 and associated text (Jun. 2023), https://www.ijdh.org/wp-content/uploads/2023/08/HRU-June-2023-FINAL_updated-8.14.pdf (“The effects of chronic hunger and malnutrition, which include compromised immunity and increased vulnerability to health issues – are particularly pronounced in children.”) (citing sources).

³²⁵ In some circumstances, it is hunger that tempts desperate children to join armed groups. See, e.g., Juhakenson Blaise, *Who are the children recruited by Haitian gangs? Ordinary kids seeking hope in impossible circumstances*, *Haitian Times* (Nov. 26, 2024), <https://haitiantimes.com/2024/11/26/haitian-children-seeking-better-life-are-recruited-by-gangs/> (“Many [children] receive meager payments—ranging from less than \$1 to \$150—or basic necessities like food and shelter in exchange for their dangerous labor.”). Lack of educational opportunity is another push factor. Eryn Davis, *In Haiti, Gangs Recruit Kids Because They Can’t Go to School*, *PassBlue* (Aug. 14, 2024), <https://www.passblue.com/2024/08/14/the-forgotten-crisis-of-haitis-children/>; *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 127 (“A lack of access to education, employment and basic necessities creates a situation where joining gangs is seen as the only viable means of survival. Gangs also lure children by giving them money, a mobile phone, motorbikes or other goods, promising further economic benefits upon joining and perhaps also some sort of social recognition. If those tactics fail, gangs resort to death threats against the children or their families, leaving the minors with no option but to join the gangs.”) (internal citations omitted); BINUH, *Quarterly report on the human rights situation in*

[Haiti](#) (April-June 2024), p. 8; Coto & Sanon, [Haiti sees a rise in killings and police executions with children targeted, UN says](#) (Oct. 30, 2024) (“A lack of access to education, employment and basic necessities creates a situation where joining gangs is seen as the only viable means of survival.”). See generally HRW, [Haiti: Criminal Violence, Hunger Trapping Children](#) (Oct. 9, 2024) (summarizing interviews with children who had joined criminal groups and cited “severe hunger” as the primary reason they joined criminal groups, and noted that “they had no legal economic or social opportunities to earn a living, buy food, or access basic necessities”).

³²⁶ See, e.g., UNICEF, [UNICEF Executive Director Catherine Russell briefing to the United Nations Security Council on the humanitarian situation in Haiti](#) (Oct. 22, 2024) (“[Children] are being used as informants, cooks, and sex slaves, and they are being forced to perpetrate armed violence themselves.”); HRW, [Haiti: Criminal Violence, Hunger Trapping Children](#) (Oct. 9, 2024) (reporting how armed groups use threats and children’s desperate humanitarian situation to force children to serve as informants, carry weapons, run errands, and participate in attacks, extortion, and kidnapping); BINUH, [Haiti: UN human rights expert William O’Neill concludes official visit, laments bleak situation](#) (Sep. 20, 2024), <https://binuh.unmissions.org/en/haiti-un-human-rights-expert-william-0%E2%80%99neil-concludes-official-visit-laments-bleak-situation> (“Gangs have increasingly trafficked children, forcibly recruited them into gangs, and often used them to carry out attacks against public institutions and police operations. Youth are losing hope of a better future.”); Norestyl, [« My life as a child member of 5 Segonn in Village de Dieu »](#) (Jun. 18, 2024) (reporting that some advocates believe children commit most of the murders by armed gangs).

³²⁷ See, e.g., HRW, [Haiti: Criminal Violence, Hunger Trapping Children](#) (Oct. 9, 2024) (reporting that “[g]irls who are forced to join criminal groups are particularly at risk of sexual violence,” with accounts of armed group leaders asking for “a virgin girl every month,” and extensive sexual assaults by other members; and describing reports from girls forcibly recruited or kidnapped by criminal groups who were “gang raped every day” for 15 days, forced to perform sexual acts while other members watched, and faced other severe sexual exploitation). See also note 292.

³²⁸ Amnesty International, [Haiti: Oral statement: Item 10: Interactive dialogue with the High Commissioner on interim report on Haiti, with the participation of the human rights expert on Haiti](#) (Oct. 8, 2024) (describing children’s reports regarding how “any perceived association with a gang could make them a target for police, rival gangs and community members”); HRW, [Haiti: Criminal Violence, Hunger Trapping Children](#) (Oct. 9, 2024) (“These children also face violence from the police and rival groups as well as so-called self-defense groups. The UN Integrated Office in Haiti documented cases of summary executions and lynchings of children between January and June. . . . [and according to human rights officials,] families and neighbors often reject and stigmatize children who return.”).

³²⁹ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 47 (describing an incident in July 2024, when “a 10-year-old boy was shot dead and his body burned by a vigilante group in the Solino neighbourhood of Port-au-Prince, after being accused of being a gang informant”).

³³⁰ See, e.g., BINUH, [Report of the Secretary General](#) (Jun. 27, 2024), ¶ 39 (“BINUH remains concerned about . . . the severely limited capacity of the judiciary to provide access to justice for children.”); RNDDH, [Appareil judiciaire et Centres de détention en Haïti : Une Justice affaiblie, des résultats invisibles et la violation systématique des garanties judiciaires des détenus.es](#) (Nov. 7, 2024), ¶¶ 81-83; [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), Annex 32 (“Particularly worrisome is the Centre d’éducation et de réinsertion des mineurs en conflit avec la loi (CERMICOL), originally aimed at minors, now houses men, women, girls, and boys, and it is more than 400% overcrowded. It is also now the only operational prison in Port-au-Prince.”) (internal citations omitted). See also HRW, [Haiti: Criminal Violence, Hunger Trapping Children](#) (Oct. 9, 2024) (describing CERMICOL as “packed, with children and adults sharing cells in inhuman conditions”). See also notes 245, 255-57 and associated text.

³³¹ Cf. Amnesty International, [Child Protection urged as the Multinational Security Support Mission deploys to Haiti](#) (Jul. 2, 2024), <https://www.amnesty.org/en/latest/news/2024/07/child-protection-urged-multinational-security-support-mission-deploys-haiti/> (emphasizing the “the need to ensure the [Multinational Security Support Mission] is prepared to encounter children during its operations, including children who have been recruited by gangs.”); Mohor, Jérôme & Kiage, [Haiti in-depth: Ten key questions as Kenyan police deploy to restore order](#) (June 26, 2024); Leila Fadel & Reena Advani, [Haiti’s interim prime minister shares his vision to lift Haiti out of chaos](#), NPR (Jul. 3, 2024), <https://www.npr.org/2024/07/03/nx-s1-5025247/the-challenges-ahead-for-interim-haitian-prime-minister-garry-conille-are-enormous> (describing former Prime Minister Gary Conille’s remarks about the “significantly different approach in disarmament and social programs” that will be necessary for the “40 to 50 percent” of gang members that may be children).

³³² Junior Legrand, [In Haiti, LGBTQ+ community expelled by neighbors and landlords](#), Ayibo Post (Aug. 13, 2024), <https://ayibopost.com/in-haiti-lgbtq-community-expelled-by-neighbors-and-landlords/> (describing reports of “violent evictions and multiple cases of physical violence” against LGBTQI+ persons); [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 123 (describing reports from two men who were forced to flee Haiti due to threats and harassment from gang members because of their sexual orientation.). According to information shared by Haitian grassroots organization *Femme en Action Contre la Stigmatisation et la Discrimination Sexuelle* (FACSDIS), transgender women have experienced discrimination from security guards in a bank in Port-au-Prince. FACSDIS also shared that a well-known armed group leader has made discriminatory and violent remarks toward lesbian women.

³³³ Legrand, [In Haiti, LGBTQ+ community expelled by neighbors and landlords](#) (Aug. 13, 2024) (noting there is “no formal law to protect [the LGBTQI+ community] from discrimination”).

³³⁴ See, e.g., Moïse Manoël-Floris, [Haïti : Risque de famine et difficultés d’accès aux traitements contre le VIH pour les personnes trans](#), 76 Crimes (Mar. 25, 2024), <https://76crimesfr.com/2024/03/25/haiti-risque-de-famine-et-difficultes-dacces-aux-traitements-contre-le-vih-pour-les-personnes-trans/>.

³³⁵ Van Bèf Info, [“Zanmi Timoun” Foundation: Advocacy for Concrete Interventions in Favor of Disabled People](#) (Dec. 3, 2024), <https://vantbefinfo.com/fondation-zanmi-timoun-plaidoyer-pour-des-interventions-concretes-en-faveur-des-personnes-handicapees/> (observing that “persons with disabilities are among the most vulnerable displaced populations” and “the absence of

concrete state interventions increases their vulnerability”); Journal of Haiti and the Americas, *Haiti: Disabled people particularly destitute in displaced persons camps*, at 9:24 (Oct. 16, 2024), <https://www.rfi.fr/fr/podcasts/journal-d-ha%C3%Afti-et-des-am%C3%A9riques/20241016-ha%C3%Afti-dans-les-camps-de-d%C3%A9plac%C3%A9s-des-personnes-handicap%C3%A9es-particuliers-%C3%A8rement-d%C3%A9munies> (reporting that people with disabilities, especially those who are elderly or limited in terms of mobility, experience added hardships in situations of displacement and are living in overcrowded, inadequate conditions without basic necessities like food, shelter, or healthcare amounting to “living graves for the most vulnerable”); Amaj Rahimi-Midani, *Hi-Tech Fixes Can End Haiti’s Water and Food Crises*, PassBlue (Nov. 12, 2024), <https://www.passblue.com/2024/11/12/hi-tech-fixes-can-end-haitis-plague-of-water-scarcity-and-food-insecurity> (“Facilities are often inaccessible to people with disabilities, further worsening public health issues.”); BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 39 (reporting “the ransacking and intentional destruction of private property and social service facilities, including schools and centres for children living with disabilities”); Handicap International, *Haiti : l’espoir de lendemains meilleurs* (Aug. 1, 2024), <https://www.handicap-international.fr/fr/actualites/haiti-l-espoir-de-lendemains-meilleurs> (targeting in particular disabled people who live in displaced persons camps and are often those whose situation is the most precarious); Odigène, *Port-au-Prince Concludes a Week of Intense Tension* (Nov. 15, 2024) (reporting anecdotally on challenges for individual with prosthetic limbs). Cf. Haiti Libre, *Haiti - Politic : Towards compliance with accessibility standards in Haiti* (Jul. 10, 2024), <https://www.haitilibre.com/en/news-43367-haiti-politic-towards-compliance-with-accessibility-standards-in-haiti.html> (reporting on government meetings concerned with ensuring that public and private institutions comply with legal requirements for accessibility); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 58 (noting existing educational disparities for children with disabilities and risk of exacerbation arising from security-related school closures); REGAH HAITI, IDEJEN & UN Women, *Addressing Haitian women’s particular needs through their leadership role* (Jul. 2024), p. 1 (reporting that persons with disabilities are forced to make due with infrastructure unsuited to their specific needs).

³³⁶ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 44.

³³⁷ See *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 40 (“[G]angs repeatedly loot farmland and steal livestock.”); UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 7 (“In the Artibonite Department, the country’s largest agricultural region, gangs have extorted farmers cultivating their lands and have often descended on fields, armed with guns and machetes, to steal their crops and livestock.”); Robles, *At Least 70 People Dead in Gang Attack in Haiti* (Oct. 4, 2024). See also FEWS, *Widespread Crisis (IPC Phase 3) outcomes persist, exacerbated by violence, food price inflation, and internal displacement* (Jun. 2024-Jan. 2025), <https://fewsn.net/latin-america-and-caribbean/haiti/food-security-outlook/june-2024>, p. 3 (“Armed gangs control the irrigation system in the Liancourt, Verrettes, and Petite Rivière valley and demand an illegal payment for using the water.”). Chronic government neglect of rural communities and the practice of expropriating *peyizan* land for the benefit of Haitian elites and foreign corporations compound these acute challenges. See IJDH, *Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2023 through May 2024* (Jun. 2024), p. 19.

³³⁸ See note 398.

³³⁹ WFP, *Hunger in Haiti reaches historic high with one-in-two Haitians now in acute hunger* (Sep. 30, 2024). See also notes 381-91 and associated text.

³⁴⁰ See notes 407-33 and associated text.

³⁴¹ See note 348.

³⁴² See generally Karim Saleh & Beatrice Mosello, *Spotlight Haiti: What are the long-term prospects for climate, peace and security?*, Climate Diplomacy (Jun. 11, 2024), <https://climate-diplomacy.org/magazine/conflict/spotlight-haiti-what-are-long-term-prospects-climate-peace-and-security>; World Bank, *Climate and Health Vulnerability Assessment: Haiti* (2024), <https://documents1.worldbank.org/curated/en/099070324141550718/pdf/P501993113120209c18dce145786e0fc312.pdf>. See also IOM, *Haiti — Summary of results from assessment of suicidal behavior in the Metropolitan Area of Port-au-Prince and recommendations for suicide prevention* (Mar. 2024), p. 2 (environmental stressors are making it “more and more difficult [for the population] to cope and to plan positively for the future”).

³⁴³ See, e.g., Jeffrey Sommers & Patrick Bellegarde-Smith, *Haiti’s Disorder Is Due to Elite Malfeasance and US Meddling*, Jacobin (Apr. 5, 2024), <https://jacobin.com/2024/04/haiti-disorder-poverty-us-intervention>.

³⁴⁴ Wilentz, *JD Vance’s Slanders Are Far From the Worst Thing the US Has Done to Haitians* (Sep. 11, 2024); Prosper et al., *Haiti’s Gang Violence Is a Symptom of Its Political Crisis*, Jacobin (Aug. 14, 2024).

³⁴⁵ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 145. See also note 200.

³⁴⁶ Brian Concannon Jr., Kristina Fried & Sasha Filippova, *Restitution for Haiti, Reparations for All: Haiti’s Place in the Global Reparations Movement*, 55 University of Miami Inter-American Law Review 80 (Dec. 13, 2023), <https://repository.law.miami.edu/cgi/viewcontent.cgi?article=2673&context=umialr>.

TPC then-president Edgar Leblanc Films called for reparations before the UN General Assembly in September. His insistence that Haiti “is today the greatest victim of a historical injustice, which has not only delayed our development but saddled our people with a burden,” reflects global recognition that solutions to Haiti’s crises must include restitution of the Independence Debt. Jacqueline Charles, *Haiti leader makes case for reparations during UN appeal for help with gang violence*, Miami Herald (Sep. 26, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article293089364.html>; UN Permanent Forum on People of African Descent (UN PFPAD), *Preliminary Conclusions and Recommendations from the Third Session*, ¶¶ 46-48 (16-19 April 2024), <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/forums/forum-african-descent/sessions/session3/2024-08-26-pfpad-conclusions-and-recommendations-3rd-session-en.pdf> (in its Preliminary Conclusions and Recommendations from its Third session, the UN PFPAD acknowledged “the strong support and the call for

restitution and reparations for Haiti” and “that Haiti’s current crisis is deeply intertwined with the profound impact and legacy of colonization, foreign domination, the institution of enslavement, unjust foreign debt and wealth extraction”).

³⁴⁷ Institut Haïtien de Statistique d’Informatique, *Indicateur conjoncturel d’Activité Economique*, https://ihsi.gouv.ht/statistiques/statistiques_economiques/icae (last visited Dec. 5, 2024) (Haiti’s GDP fell by 3.8% between October 2023 and June 2024); Esther Kimberly Bazile, *Boosting Financial Resilience in Haiti: A Must for the Economy*, Le Nouvelliste (Jun. 27, 2024), <https://lenouvelliste.com/en/article/248856/boosting-financial-resilience-in-haiti-a-must-for-the-economy>; BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 46.

³⁴⁸ World Bank, *Haiti*, p. 2 (Oct. 2024), <https://thedocs.worldbank.org/en/doc/e408a7e21ba62d843bdd90dc37e61b57-0500032021/related/mpo-hti.pdf> (36.6% are living in extreme poverty, defined as living on less than \$2.15 per day).

³⁴⁹ Institut Haïtien de Statistique d’Informatique, <https://ihsi.gouv.ht/> (last visited Dec. 5, 2024). *See also* Evens Sanon & Dánica Coto, *Hunger in Haiti reaches famine levels as gangs squeeze life out of the capital and beyond*, AP News (Oct. 1, 2024), <https://apnews.com/article/haiti-hunger-starving-report-af625f8d80698788624dfbcc30c656a4> (inflation hit an annual high of 30% in July).

³⁵⁰ Institut Haïtien de Statistique d’Informatique, *Indice des Prix à la Consommation (IPC)*, https://ihsi.gouv.ht/statistiques/statistiques_economiques/ipc (last visited Dec. 4, 2024) (the prices of food and non-alcoholic beverages are the most impacted, with the cost of rice increasing by 55.9%, corn by 48.7%, millet by 50.1%, meat by 41.7%, fresh fish by 44.3%, herring by 41.6%, edible oils by 44%, banana by 44.2%, and lemon by 90.7%). *See also* note 371.

³⁵¹ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 60 (the cost of a food basket has increased as much as 16% in the Northwest and South Departments); Sanon & Coto, *Hunger in Haiti reaches famine levels as gangs squeeze life out of the capital and beyond* (Oct. 1, 2024) (reporting an increase of over 11%). *But see* <https://haitiantimes.com/2024/07/31/haiti-increase-in-rice-production-in-maribaroux-plainn-in-the-ferrier-commune/> (reporting that a newly built irrigation canal in the Northeast Department has increased crop yields in the region and reduced the cost of rice for local markets).

³⁵² IPC, *Haiti: IPC: Acute Food Insecurity Snapshot* (Aug. 2024-Jun. 2025), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Haiti_Acute_Food_Insecurity_Aug2024_Jun2025_Snapshot_English.pdf. *See also* WFP, *Hunger in Haiti reaches historic high with one-in-two Haitians now in acute hunger* (Sep. 30, 2024) (“[T]raumatized families who have seen their incomes and livelihoods vanish struggle to buy enough food amid spiraling prices.”).

³⁵³ REGAH HAITI, IDEJEN & UN Women, *Addressing Haitian women’s particular needs through their leadership role* (Jul. 2024), ¶ 2 (“Nearly 88.1 per cent of women and 82.8 per cent of men who participated in this study have no source of income in the camps.”); Sanon & Coto, *Hunger in Haiti reaches famine levels as gangs squeeze life out of the capital and beyond* (Oct. 1, 2024) (a displaced woman “said she depends solely on remittances to feed herself and her 8-year-old boy, but the money barely lasts a week.”).

³⁵⁴ GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 2* (Nov. 2024), p. 9 (“Viv Ansanm’s strengthened territorial control has allowed the gangs to expand their ability to extort and impose protection rackets, further embedding the gangs within Haiti’s socio-economic and political structures.”); GI-TOC, *Will the Artibonite massacre be a turning point in Haiti?* (Oct. 9, 2024) (armed groups in rural areas have imposed “a regime of extortion and protection rackets on farmers, markets, traders, and the networks of trucks and logisticians involved in transporting goods between the north and south of the country”); Lucnise Duquereste, *Bandits impose lucrative taxation system in Carrefour*, Ayibo Post (Jul. 29, 2024), <https://ayibopost.com/bandits-impose-lucrative-taxation-system-in-carrefour/>.

³⁵⁵ FJKL, *Massacre de Pont Sondé : A qui la faute ? La FJKL s’interroge* (Oct. 2024), ¶¶ 9-10 (at illegal toll booths in the Artibonite Department, armed groups charge “[m]otorcycle drivers . . . two hundred and fifty gourdes (250.00G) to pass through the toll booth, van drivers two thousand five hundred gourdes (2,500.00G) and mini bus drivers five thousand gourdes (5,000.00G).”); *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶¶ 28, 44 (“[I]llegal tolls have multiplied not only along the main roads connecting Port-au-Prince to other areas, but also on secondary roads and streets in several neighbourhoods of the metropolitan area.”); Jacqueline Charles, *Gangs fled a Haitian town as Kenya force moved in. But only for a day*, Miami Herald (Jul. 30, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article290546229.html> (reporting that trucks carrying goods “usually pay hundreds of dollars in fees to pass through the gang’s checkpoints” along the bridge connecting the city of Malpasse, near the Dominican border, with Port-au-Prince); Duquereste, *Bandits impose lucrative taxation system in Carrefour* (Jul. 29, 2024) (“At Carrefour, everything has to be paid for. . . . The gangs operate toll booths on the national road, at Fontamara, Truitier and Mariani. They have also set up checkpoints in almost every area within the municipality, as well as toll booths to extort motorcyclists, vehicle drivers, and shopkeepers.”); Blaise, *Gangs’ grip on Haitian capital spurs new kind of street vendor: Men selling cooked rice* (Jul. 18, 2024) (“[Armed groups] operate several checkpoints, earning between \$6,000 and \$8,000 (USD) daily. They hijack cargo containers and extort businesses, demanding between \$5,000 and \$20,000 (USD) weekly.”); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 40 (“At illegal gang-run checkpoints along main roads, victims are required to hand over large sums of cash to continue on their journey.”).

³⁵⁶ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 43; *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶¶ 156-58 (“[The] Delmas 6 [armed group] has been looting businesses, including those of their ‘clients’ who pay it a monthly fee for ‘protection.’”); UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 18 (“Business owners are extorted in exchange for “protection” to continue operating. . . . Despite handing over extortion payments to the gangs, many businesses are still destroyed or looted by gangs.”); Duquereste, *Bandits impose lucrative taxation system in Carrefour* (Jul. 29, 2024); Michelson Césaire, *Port-au-Prince: Government Fails to Protect Both the Deceased and the Living*, Le Nouvelliste (Jun. 26, 2024), <https://lenouvelliste.com/en/article/248830/port-au-prince-government-fails-to-protect-both-the-deceased-and-the-living> (armed groups are using Port-au-Prince’s municipal cemetery as a hideout and extorting funeral companies transporting the dead, “leading to abandoned corpses in the streets”). According to information shared by a network of healthcare organizations operating in Haiti, armed groups in Cabaret (a commune in the West Department) are more frequently

visiting homes and businesses, including a health clinic, asking for a "tax" to stay open. See also UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 18 (“Some self-defence groups, which present themselves as protectors of the population against gangs, have resorted to the same practices of extorting local businesses.”).

³⁵⁷ Joseph, [Gangs demand hefty ransom for seized homes in Haiti’s rural Gros-Morne](#) (Sep. 8, 2024) (in the Artibonite Department, the *Kokorat San Ras* armed group “is now extorting residents, demanding \$298 per household to allow them to return or reclaim their homes”); Duquereste, [Bandits impose lucrative taxation system in Carrefour](#) (Jul. 29, 2024) (“According to several witnesses, the bandits affix a note to vacant houses. This note contains the name of the gang in question and a contact number in the event of a return, in order to pay the required fees. . . . The bandits are also demanding payment for moves, according to Carrefour residents. In Brochette, for example, the price is set according to the type of trip. One who leaves with a suitcase pays less than a more heavily laden citizen.”); [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 158.

³⁵⁸ AlterPresse, [Haïti-Criminalité : La peur commence à changer de camp à Anse d’Hainault](#) (Aug. 13, 2024).

³⁵⁹ See notes 69, 109, 116.

³⁶⁰ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶¶ 40, 44 (between June and October, armed groups hijacked 66 trucks transporting products, and attacks against boats transporting goods across the bay of Port-au-Prince increased); Roberson Alphonse, [Insecurity Leads to Ongoing Paralysis at CPS for Nearly a Month](#), *Le Nouvelliste* (Oct. 9, 2024), <https://lenouvelliste.com/en/article/250806/insecurity-leads-to-ongoing-paralysis-at-cps-for-nearly-a-month> (the shutdown of operator Caribbean Port Services, which accounts for 75% of the maritime transportation market at the port, affected “importers, revenue, and the supply of goods to the market”); Charles, [This seaside Haiti town used to draw tourists. Now it draws refugees from gangs](#), (Sep. 24, 2024) (“Communities [in the Grand South] long dependent on the highways linking them to Haiti’s congested capital for everything from fuel to imported food are hurting as gangs expand their territory.”).

³⁶¹ [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), at 2, ¶ 146 (“As it became more apparent that the Multinational Security Support mission would soon deploy, gangs became more aggressive. They sought to capitalize on the limited window of opportunity for generating additional illicit revenue by conquering new territory . . . and targeting key economic hubs, such as seaports, roads, private investment firms and banks.”).

³⁶² Robles, [At Least 70 People Dead in Gang Attack in Haiti](#) (Oct. 4, 2024); FEWS, [Violence, food inflation, and internal displacement exacerbate widespread Crisis \(IPC Phase 2\) outcomes](#) (Oct. 2024-May 2025), <https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook/october-2024>; BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 46.

³⁶³ Péliissier & Louis-Jeune, [The humanitarian crisis is worsening in Haiti](#) (Nov. 26, 2024) (“According to an executive at the Varreux oil terminal, fuel stocks already present in the country remain sufficient, however the roads are too dangerous for truckers.”); Roberson Alphonse, [Rising Threat of “Peyi Lòk” and the Struggle Over Position Allocation Between CPT and PM](#), *Le Nouvelliste* (Nov. 14, 2024), <https://lenouvelliste.com/en/article/251465/rising-threat-of-peyi-lok-and-the-struggle-over-position-allocation-between-cpt-and-pm> (“The majority of gas stations are out of stock, but there is fuel at the Varreux oil terminal. Trucks haven’t been able to reach the terminal since Monday due to the actions of the ‘Viv Ansanm’ group.”); Valéry Félix, [Northeast: Crime in Port-au-Prince Impacts the Commercial Sector](#), *Le Nouvelliste* (Nov. 14, 2024), <https://lenouvelliste.com/en/article/251458/northeast-crime-in-port-au-prince-impacts-the-commercial-sector> (the impact was felt acutely as far away as in the Northeast Department, where gas stations were forced to shut down and fuel prices increased dramatically). See also Charles, [Police, residents kill dozens of Haitian gang members after attack in Pétiyon-Ville](#) (Nov. 20, 2024) (“[F]ear of being killed is fueling a shortage in gasoline and diesel because truck drivers, afraid of being shot, refuse to deliver supplies.”).

³⁶⁴ BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 40 (a salient example is Port-au-Prince’s Croix-des-Bossales market, “once the largest market in the country”); Duquereste, [Bandits impose lucrative taxation system in Carrefour](#) (Jul. 29, 2024) (“Many traders have abandoned the three important markets in the municipality, namely « Mache Divalye » in Truitier, « Mache Dèyè pòs » in Brochette, and « Mache Dekatis » in Mahotièr” because of the “taxes” imposed by armed groups on merchants.).

³⁶⁵ [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶¶ 159-61, 163 (attacks on banks by armed groups have “contributed to panic among clients, leading to bulk withdrawals,” while the loss of skilled labor due to insecurity is “a major loss that hampers the country’s economic development”).

³⁶⁶ See [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 144 (“During the reporting period, several corporate entities closed or disinvested as a way of derisking, leading to a gradual contraction of the country’s economy.”); Latin America Post, [Citigroup’s Strategic Exit from Haiti and Its Impact on Latin America](#) (Jul. 9, 2024), <https://latinamericanpost.com/business-and-finance/citigroups-strategic-exit-from-haiti-and-its-impact-on-latin-america/> (“Citigroup has announced it will cease operations in Haiti after over fifty years due to weak demand and reduced international banking activity. . . . [I]ts departure could signal a need for more confidence in Haiti’s financial prospects, potentially discouraging other foreign investors.”); BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 48 (“The multidimensional crisis is a setback to the textile and apparel industry, Haiti’s main export sector. Trade data on United States imports indicate a drop of more than 25 per cent between March 2023 and March 2024, due to the insecurity and uncertainty that crippled day-to-day operations.”). See also [iciHaiti, Insecurity : Dominicans refuse to sell in the new market of Ouanaminthe](#) (Sep. 10, 2024), <https://www.ichaiti.com/en/news-43172-ichaiti-insecurity-dominicans-refuse-to-sell-in-the-new-market-of-ouanaminthe.html> (“Due to the insecurity in Haiti, Dominican merchants in the border market of Dajabón refuse to do business with Haitians in the new market in Ouanaminthe.”).

³⁶⁷ See, e.g., BINUH, [Report of the Secretary-General](#) (Jun. 27, 2024), ¶ 48 (“According to data from the Better Work programme, a collaborative partnership between the International Finance Corporation and the International Labour Organization, there was a 61 per cent reduction in the number of formal jobs in the country’s garment industry between September 2023 and mid-March 2024.”).

³⁶⁸ Press Release, OHCHR, [Haiti: UN Human Rights chief urges end to intensifying violence in Port-au-Prince](#) (Nov. 20, 2024) (discussing the “severe” water shortage); PAHO, [Public Health Situation Analysis – Haiti](#) (Oct. 4, 2024) (“Haiti is the most underserved country in the Americas in terms of water and sanitation infrastructure.”); Pierre Louis, [Conditions sanitaires alarmantes pour les déplacés internes logés au local du MENFP](#) (Jul. 25, 2024) (“According to UNICEF, just over a quarter (26%) of Haitians do not have access to improved water sources, with significant disparities between rural areas where 41% of the population is affected and urban areas where this figure drops to 5%. Only 25% of households have adequate facilities for washing hands with soap, and a similar proportion practice open defecation, particularly affecting rural areas where this rate reaches 36%, compared to 10% in urban areas.”); Louis-Jeune, [La Gônave: A risky journey for families forced to flee to Arcahaie due to insecurity](#) (Nov. 18, 2024) (on the island of La Gonâve, “[a] single source supplies four neighborhoods” and “[s]ome people are forced to travel many kilometers to get drinking water”).

³⁶⁹ Martial, [Struggling for every drop: The water crisis in Port-de-Paix](#) (Aug. 12, 2024) (one resident reported spending four or more days without water at a time; another complained that “[s]ometimes the water that comes out of our taps is so dirty I can’t even use it, not even for washing, let alone drinking”).

³⁷⁰ See World Bank, [Haiti](#) (Oct. 2024), p. 2.

³⁷¹ Martial, [Struggling for every drop: The water crisis in Port-de-Paix](#) (Aug. 12, 2024).

³⁷² OCHA, [Haiti – Advocacy note for the immediate mobilization of resources, August 2024](#) (Aug. 21, 2024), p. 6 (“The 60 per cent increase in population displacements has led to reduced access to drinking water in host communities. The already insufficient water supply infrastructure, which operates partially due to energy shortages (fuel, electricity), now faces a surge in demand that it cannot meet.”); Pierre Louis, [Conditions sanitaires alarmantes pour les déplacés internes logés au local du MENFP](#) (Jul. 25, 2024). See also notes 100-01.

³⁷³ PAHO, [Public Health Situation Analysis – Haiti](#) (Oct. 4, 2024), p. 6.

³⁷⁴ World Bank, [Climate and Health Vulnerability Assessment: Haiti](#) (2024), ¶ 41.

³⁷⁵ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 59 (“The Artibonite Department accounts for 71.8 per cent of rice production but faces declining production rates owing to insecurity and water shortages.”)

³⁷⁶ PAHO, [Public Health Situation Analysis – Haiti](#) (Oct. 4, 2024), p. 11; Martial, [Struggling for every drop: The water crisis in Port-de-Paix](#) (Aug. 12, 2024) (detailing long-standing corruption, mismanagement, and neglect within the National Directorate of Drinking Water and Sanitation that has left residents in the Northwest Department without adequate access to drinking water); UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 23 (“The state of various drainage canals in Port-au-Prince illustrates the consequence of the interlinked phenomenon of gang violence and poor governance”). See also Onz Chéry, [At least 2 dead, 13 injured, and hundreds of homes flooded across Haiti after days of heavy rains expose lingering drainage failures](#), Haitian Times (Dec. 5, 2024), <https://haitiantimes.com/2024/12/05/northern-department-flood-irrigation-system/>; Rahimi-Midani, [Hi-Tech Fixes Can End Haiti’s Water and Food Crises](#) (Nov. 12, 2024); AlterPresse, [Haïti-Environnement : Alerte contre une dégradation environnementale accélérée à Hinche](#) (Nov. 2, 2024), <https://www.alterpresse.org/spip.php?article31091> (canals in Hinche, in the Centre Department, are contaminated with fecal matter); Jacqueline Charles & Johnny Fils-Aimé, [Video shows Haiti’s largest public hospital, which has been ravaged by gangs](#), Miami Herald (Jul. 12, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article289975799.html> (“[T]he mounting trash on Haiti’s streets. . . is a public health hazard.”). For example, chronic state failures to manage waste and sanitation in markets in the north of the country are posing a public health risk. Kervenson Martial, [Port-de-Paix residents cry for help as trash overtakes the city](#), Haitian Times (Aug. 29, 2024), <https://haitiantimes.com/2024/08/29/port-de-paix-residents-cry-for-help-as-trash-overtakes-the-city/> (“Haïti’s Port-de-Paix, originally designed for 10,000 residents, is now home to over 300,000, exacerbating the city’s waste management crisis. Streets are filled with uncollected garbage, posing serious health and environmental risks. Local authorities, constrained by limited resources, rely on community efforts to manage the growing waste, but without adequate support, the situation continues to deteriorate.”); Onz Chéry, [The other side of Cap-Haïtien’s clean market: A pile of trash from it](#), Haitian Times (Aug. 2, 2024), <https://haitiantimes.com/2024/08/02/pile-of-trash-near-cap-haitien-indoor-market/> (the lack of nearby landfills and the high cost of fuel to transport waste is contributing to waste build-up near an indoor market in Cap-Haïtien, which risks contaminating food being sold in the market); Kervenson Martial, [Outdoor markets in Haiti’s northwest may soon get public health-inspired facelifts](#), Haitian Times (Jun. 28, 2024), <https://haitiantimes.com/2024/06/28/authorities-in-haitis-northwest-seek-reorganization-and-regulation-of-markeplaces/> (“The dizzying smells [in public markets in and around Port-de-Paix], according to local health authorities and many residents, is a sign of the public health risk that poor hygiene surrounding the marketplace and lack of government regulation have created.”).

³⁷⁷ Péliissier & Louis-Jeune, [The humanitarian crisis is worsening in Haiti](#) (Nov. 26, 2024); Duquereste, [Bandits impose lucrative taxation system in Carrefour](#) (Jul. 29, 2024) (for example, armed groups took control of water supply valves in several Carrefour districts in July, leaving residents without adequate access to water). See also note 83.

³⁷⁸ See, e.g., Martial, [Struggling for every drop: The water crisis in Port-de-Paix](#) (Aug. 12, 2024) (reporting concerns that deforestation will further reduce the availability of clean water).

³⁷⁹ UN News, [UN’s Ban apologizes to people of Haiti, outlines new plan to fight cholera epidemic and help communities](#) (Dec. 1, 2016), <https://news.un.org/en/story/2016/12/546732>.

³⁸⁰ See IJDH, [Broken UN Promises Lead to Haiti Cholera Resurgence](#) (Oct. 11, 2022), <https://www.ijdh.org/press-release/broken-un-promises-lead-to-haiti-cholera-resurgence/>.

³⁸¹ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 60 (“Almost half of the population (48 per cent) is classified under Integrated Food Security Phase Classification (IPC) 3 (crisis). This represents a 4 per cent rise compared with the same period last year.”); UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 20 (“The results of the latest Integrated Food Security Phase Classification show a deterioration in the country’s food security, with

the worst results recorded since 2010.”); Trinidad & Tobago Guardian, *FAO expressing concerns regarding food security in Haiti* (Jun. 24, 2024), <https://www.guardian.co.tt/news/fao-expressing-concerns-regarding-food-security-in-haiti-6.2.2035332.bff9c2e170> (“Haiti is the only country in the [Latin America and Caribbean] region that is considered to be in a major protracted food crisis, is one of nine countries in the world at risk of famine and is among the five countries with more than 10 per cent of the population in emergency.”).

³⁸² UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 20 (citing WFP, *Hunger Hotspots FAO–WFP early warnings on acute food insecurity June to October 2024 outlook*, p. (2024), https://docs.wfp.org/api/documents/WFP-0000159235/download/?_ga=2.196854702.362524591.1733801680-1344969816.1731342143).

³⁸³ IPC, *Haiti: IPC: Acute Food Insecurity Snapshot* (Aug. 2024–Jun. 2025); WFP, *Hunger in Haiti reaches historic high with one-in-two Haitians now in acute hunger* (Sep. 30, 2024). This is almost half a million more than in June. IJDH, *Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2023 through May 2024* (Jun. 2024), p. 10.

³⁸⁴ Sanon & Coto, *Hunger in Haiti reaches famine levels as gangs squeeze life out of the capital and beyond* (Oct. 1, 2024).

³⁸⁵ IPC, *Haiti: IPC: Acute Food Insecurity Snapshot* (Aug. 2024–Jun. 2025); WFP, *Hunger in Haiti reaches historic high with one-in-two Haitians now in acute hunger* (Sep. 30, 2024) (they are “facing extreme food shortages, acute malnutrition and high disease levels”).

³⁸⁶ WFP, *Hunger in Haiti reaches historic high with one-in-two Haitians now in acute hunger* (Sep. 30, 2024) (they are facing “death, destitution, and extremely critical acute malnutrition levels”); BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 60; Sanon & Coto, *Hunger in Haiti reaches famine levels as gangs squeeze life out of the capital and beyond* (Oct. 1, 2024) (“The 5,636 people who are facing starvation, the worst level, live in makeshift shelters across the metropolitan area.”).

³⁸⁷ IPC, *Haiti: IPC: Acute Food Insecurity Snapshot* (Aug. 2024–Jun. 2025) (“About 5.54 million people out of the 11.2 million people analysed are projected to experience high levels of acute food insecurity (IPC Phase 3 or above) in Haiti between March and June 2025.”).

³⁸⁸ OCHA, *Haiti – Advocacy note for the immediate mobilization of resources, August 2024* (Aug. 21, 2024). See also notes 322–23 and associated text.

³⁸⁹ See *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 115 (“The Cité Soleil commune in Port-au-Prince remains one of the most affected areas.”); OCHA, *Haiti – Advocacy note for the immediate mobilization of resources, August 2024* (Aug. 21, 2024), p. 2 (the entire Artibonite Department is in severe nutritional distress).

³⁹⁰ OCHA, *Haiti – Advocacy note for the immediate mobilization of resources, August 2024* (Aug. 21, 2024), p. 2 (the communes of Bainet, Belle Anse, Jacmel, and La Vallée in the Southeast Department, and Caracol, Carice, Cité and Ouanaminthe in the Northeast Department are severely impacted); IPC, *Haiti: IPC: Acute Food Insecurity Snapshot* (Aug. 2024–Jun. 2025). See also Sanon & Coto, *Hunger in Haiti reaches famine levels as gangs squeeze life out of the capital and beyond* (Oct. 1, 2024) (Martine Villeneuve, Haiti director for the nonprofit Action Against Hunger, expressed surprise “that some of the 2 million people hit by hunger don’t even live in places directly affected by gang violence”).

³⁹¹ GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 2* (Nov. 2024), p. 5. See also BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 60 (“[P]rice monitoring by the World Food Programme (WFP) for September 2024 shows that some shortages of wheat flour and rice led to severe acute malnutrition with an increased risk of mortality.”); Sanon & Coto, *Hunger in Haiti reaches famine levels as gangs squeeze life out of the capital and beyond* (Oct. 1, 2024) (“Jean Yonel, who fled his home with his family after gangs raided their neighborhood, said there are days that he, his wife and their seven children eat only white rice or spaghetti. ‘I can’t provide every day for these children,’ Yonel said. ‘Sometimes we take just a spoonful of food and leave the rest of the food for the kids so they don’t die.’”); World Bank, *Climate and Health Vulnerability Assessment: Haiti* (2024), ¶ 43 (“Haitians’ diets are characterized by poor quality and limited diversity. Their diet is based on rice, maize, wheat, and sorghum, which is lacking in terms of foods rich in proteins such as fish, meat, dairy, or eggs.”).

³⁹² ACAPS, *Haiti: Criminal gang violence in Port-au-Prince*, p. 3 (Jun. 6, 2024), https://www.acaps.org/fileadmin/Data_Product/Main_media/20240606_ACAPS_Haiti_Criminal_Gang_Violence_in_Port-au-Prince_Final.pdf (“By 23 May, four of five households had adopted food-related coping strategies, such as borrowing food and reducing the number or size of meals per day”).

³⁹³ Sanon & Coto, *Hunger in Haiti reaches famine levels as gangs squeeze life out of the capital and beyond* (Oct. 1, 2024); UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 20; IPC, *Haiti: IPC: Acute Food Insecurity Snapshot* (Aug. 2024–Jun. 2025); World Bank, *Climate and Health Vulnerability Assessment: Haiti* (2024), ¶ 44. See also BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 46 (“The supply-side shock caused in recent months by the protracted deterioration of the security situation could continue to fuel inflationary pressures in fiscal year 2024 and worsen the hunger crisis.”).

³⁹⁴ See notes 52, 355, 360.

³⁹⁵ PAHO, *Public Health Situation Analysis – Haiti* (Oct. 4, 2024), p. 9; IPC, *Haiti: IPC: Acute Food Insecurity Snapshot* (Aug. 2024–Jun. 2025) (“The escalation of violence in Gressier, Ganthier and Port-au-Prince is resulting in serious difficulties in supplying basic foodstuffs to the regions, limiting households’ physical and financial access to food. . . . Farmers are also unable to sell their produce due to the blocking of various roads linking the metropolitan area to the regions.”); FEWS, *Violence, food inflation, and internal displacement exacerbate widespread Crisis (IPC Phase 2) outcomes* (Oct. 2024–May 2025); USAID, *Haiti – Complex Emergency*, p. 3 (Sep. 6, 2024), https://www.usaid.gov/sites/default/files/2024-09/2024-09-06_USAID-BHA_Haiti_Complex_Emergency_Fact_Sheet_4.pdf. Humanitarian aid is also impacted. See note 577.

- ³⁹⁶ Alphonse, [Rising Threat of “Peyi Lòk” and the Struggle Over Position Allocation Between CPT and PM](#) (Nov. 14, 2024); Carlos Felipe Jaramillo, [Haiti’s food crisis needs long-term solutions](#), World Bank Blogs (Nov. 12, 2024), <https://blogs.worldbank.org/en/latinamerica/haiti-food-crisis-needs-long-term-solutions> (“Imagine being hungry but feeling too scared to go outside your home to buy food. And even if you venture to the store, you might find empty shelves because farmers and food suppliers dare not stock them.”); Crisis24, [Haiti: Gang violence continues to disrupt access to Port-au-Prince’s port as of Oct. 2; insecurity likely nationwide through at least late October](#) (Oct. 3, 2024), <https://crisis24.garda.com/alerts/2024/10/haiti-gang-violence-continues-to-disrupt-access-to-port-au-princes-port-as-of-oct-2-insecurity-likely-nationwide-through-at-least-late-october-update-22>.
- ³⁹⁷ Jaramillo, [Haiti’s food crisis needs long-term solutions](#) (Nov. 12, 2024); Sanon & Coto, [Hunger in Haiti reaches famine levels as gangs squeeze life out of the capital and beyond](#) (Oct. 1, 2024).
- ³⁹⁸ UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 7 (“[A]ttacks on farmland and livelihoods have forced farmers to abandon more than 3,000 hectares of land and move to less fertile but safer areas, which has contributed to the food crisis.”); AlterPresse, [Haïti-Agriculture-Violences : Le calvaire des producteurs agricoles et la poussée de l’insecurité alimentaire](#) (Sep. 16, 2024), <https://www.alterpresse.org/spip.php?article30903>.
- ³⁹⁹ Wilentz, [JD Vance’s Slanders Are Far From the Worst Thing the US Has Done to Haitians](#) (Sep. 11, 2024) (“The ubiquitous market women who come down from the countryside to sell in the cities’ markets—the picturesque lifeblood of Haitian commerce—are under constant threat of robbery and physical attack.”); UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 12 (“[Mass kidnapping] has disproportionately affected the “Madan Sara”, women small-scale producers and traders of agricultural products who usually travel by public transport to the local markets.”).
- ⁴⁰⁰ [Final report of the Panel of Experts on Haiti](#) (Sep. 30, 2024), ¶ 127 (“A lack of access to education, employment and basic necessities creates a situation where joining gangs is seen as the only viable means of survival.”); Kat Lay, [Kidnappers took his staff, then his son. But this Haitian doctor is refusing to flee](#), The Guardian (Nov. 15, 2024), <https://www.theguardian.com/global-development/2024/nov/15/kidnappers-took-his-staff-then-his-son-but-this-haiti-doctor-is-refusing-to-flee-dr-jean-william-bill-pape-gang-warfare> (one kidnapping victim said some of his kidnappers are 16 or 17 years old and are only doing that work because “the country has nothing better to offer” or “for protection for their family”); Prosper et al., [Haiti’s Gang Violence Is a Symptom of Its Political Crisis](#), Jacobin (Aug. 14, 2024) (“Gangs are mostly composed of boys and young men (with a few women), who, faced with high rates of unemployment and without basic educational skills, decide to join for protection in order to acquire masculine respect from their community and to make money.”); IOM, [Haiti — Summary of results from assessment of suicidal behavior in the Metropolitan Area of Port-au-Prince and recommendations for suicide prevention](#) (Mar. 2024), p. 2. See also Blaise, [Gangs’ grip on Haitian capital spurs new kind of street vendor: Men selling cooked rice](#) (Jul. 18, 2024) (some young men have turned to selling cooked food on the street – traditionally a women’s job – as an alternative to joining an armed group).
- ⁴⁰¹ HRW, [Haiti: Criminal Violence, Hunger Trapping Children](#) (Oct. 9, 2024) (“Children associated with criminal groups told Human Rights Watch that hunger is the main factor that either compels them to join these groups or leads their families to allow it”).
- ⁴⁰² See note 325 and associated text.
- ⁴⁰³ FEWS, [Widespread Crisis \(IPC Phase 3\) outcomes persist, exacerbated by violence, food price inflation, and internal displacement](#) (Jun. 2024-Jan. 2025). See also Kervenson Martial, [Haïti’s women demand government support for modern agriculture on World Day of Rural Women](#), Haitian Times (Oct. 23, 2024), <https://haitiantimes.com/2024/10/23/haitis-women-demandgovernment-support-for-modern-agriculture-on-world-day-of-rural-women/>.
- ⁴⁰⁴ Via Campesina, [Haiti: The struggle for Food Sovereignty amid political and systemic turmoil](#) (Aug. 22 2024), <https://viacampesina.org/en/haiti-the-struggle-for-food-sovereignty-amid-political-and-systemic-turmoil/>; Sandra C. Wisner, [Starved for Justice: International Complicity in Systemic Violations of the Right to Food in Haiti](#), HRLR Online (May 10, 2022), <https://hrlr.law.columbia.edu/hrlr-online/starved-for-justice-international-complicity-in-systemic-violations-of-the-right-to-food-in-haiti/>.
- ⁴⁰⁵ See notes 574-77.
- ⁴⁰⁶ UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 20 (listing “extreme weather conditions” as a contributing factor to Haiti’s acute hunger crisis); IPC, [Haiti: IPC: Acute Food Insecurity Snapshot](#) (Aug. 2024-Jun. 2025) (“The Haitian people are still suffering from the residual effects of various climatic shocks such as the impact of Hurricane Matthew and the 2021 earthquake as well as periodic droughts.”); World Bank, [Climate and Health Vulnerability Assessment: Haiti](#) (2024), p. 1 (“Over the past 30 years, Haiti has experienced 34 flooding events, 35 significant storms, and 31 hurricanes including Hurricane Matthew in 2016. Haiti also experiences periodic droughts that have impacted its agricultural production and exacerbated food insecurity.”); AlterPresse, [Cyclone Beryl : Inondations et d’immenses dégâts dans plusieurs communes du grand Sud d’Haïti](#) (Jul. 4, 2024), <https://www.alterpresse.org/spip.php?article30640> (reporting on flood damage to the agricultural sector in the South after Hurricane Beryl struck Haiti in early July).
- ⁴⁰⁷ Lay, [Kidnappers took his staff, then his son. But this Haitian doctor is refusing to flee](#) (Nov. 15, 2024) (Dr. Jean William “Bill” Pape’s “medical staff, those who have not fled, are regularly kidnapped”); Claudy Junior Pierre, [Transition Period Puts Haiti’s Healthcare System to the Test](#), Le Nouvelliste (Nov. 13, 2024), <https://lenouvelliste.com/en/article/251417/transition-period-puts-haitis-healthcare-system-to-the-test> (reporting “dozens of pharmacies looted and burned, laboratories vandalized, and hospitals, including the University Hospital of Haiti, destroyed”); Charles & Fils-Aimé, [Video shows Haiti’s largest public hospital, which has been ravaged by gangs](#) (Jul. 12, 2024); @AmeriqueInfo7, X (Nov. 13, 2024), <https://x.com/AmeriqueInfo7/status/1856675356620501252> (armed groups shot at a urologist and her father, also a doctor, as they were leaving his clinic, killing the urologist); Jacqueline Charles & Syra Ortiz Blanes, [U.S. deportation flight lands in Haiti amid spreading violence, attack on Catholic nuns](#), Miami Herald (Nov. 1, 2024), <https://www.miamiherald.com/news/nation->

[world/world/america/haiti/article294851349.html](https://www.world/america/haiti/article294851349.html) (in October, armed groups attacked and set on fire the hospital run by the Missionaries of Charity, which provided “free healthcare to 30,000 people a year through an outpatient clinic, and offered free hospitalization to hundreds”); France24, *Victims of Haiti’s gangs face health system in crisis* (Jun. 25, 2024), <https://www.france24.com/en/live-news/20240625-victims-of-haiti-s-gangs-face-health-system-in-crisis> (“Gangs control most of the sprawling capital and have repeatedly attacked hospitals and clinics, making off with much-needed medical supplies.”). See generally Insecurity Insight, *Haiti: Violence Against Health Care in Conflict 2023* (Sep. 2, 2024); Arens Jean Ricardo Modeus et al., *Impact of gang violence in Haiti on healthcare delivery and medical education*, *Lancet Reg Health Am.* (Jun. 2024), <https://pmc.ncbi.nlm.nih.gov/articles/PMC11220543>. See also BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 33 (reporting “intentional destruction of facilities operated by social services providers”).

⁴⁰⁸ HRW, *Haiti: Scarce Protection as Sexual Violence Escalates* (Nov. 25, 2024), <https://www.hrw.org/news/2024/11/25/haiti-scarce-protection-sexual-violence-escalates> (“In areas controlled by criminal groups, most health centers are inoperative.”); BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 53 (“Healthcare remains alarmingly inaccessible.”); Evens Sanon, *Haitian prime minister tours Port au Prince hospital after police take back from gang control*, *AP News* (Jul. 9, 2024), <https://apnews.com/article/haiti-hospital-gang-violence-kenyan-forces-30a26a849d90f7c32be9c1f888ab89c0> (“The attacks from criminal groups have pushed Haiti’s health system to the brink of collapse and the escalating violence has led to a surge in patients with serious illnesses and a shortage of resources to treat them.”); RHI News, *Le système de santé de la capitale haïtienne “au bord du gouffre”-ONU...* (Jun. 30, 2024), <https://www.rhinews.com/actualites/le-systeme-de-sante-de-la-capitale-haitienne-au-bord-du-gouffre-onu/> (“Haiti’s health ministry estimates that nearly 40 percent of facilities offering treatment beds, including the country’s main university hospital, have closed in the past two months due to insecurity and looting, mainly by gangs.”). See also Charles, *What a gang attack in a rural Haiti town says about the Kenya-led security mission* (Jul. 26, 2024) (armed group violence in Ganthier threatens the operations of the Higgins Brothers Surgicenter for Hope, one of the region’s only medical facilities still functioning).

⁴⁰⁹ HRW, *Haiti: Criminal Violence, Hunger Trapping Children* (Oct. 9, 2024) (“Only 24 percent of Port-au-Prince health facilities function at normal capacity.”). See also PAHO, *Public Health Situation Analysis – Haiti* (Oct. 4, 2024), p. 4 (“By 27 September 2024, most hospitals or health centres (73%) in the Ouest department either ceased operations or provided only basic and limited services”); OCHA, *Haiti Emergency Situation Report No. 28 (as of 5 July 2024)* (Jul. 7, 2024), <https://reliefweb.int/report/haiti/haiti-emergency-situation-report-no-28-5-july-2024> (as of July, “less than 20 per cent of critical health facilities to treat serious trauma in Port-au-Prince are functioning at their regular capacity and 39 per cent of healthcare facilities with in-patient care in the capital area are closed”); Wilentz, *JD Vance’s Slanders Are Far From the Worst Thing the US Has Done to Haitians* (Sep. 11, 2024) (“Only one hospital in all of Port-au-Prince—l’Hôpital Universitaire de la Paix—can be called functional.”); AlterPresse, *Violences des gangs : Soutien renouvelé du gouvernement américain au système de santé en Haïti* (Oct. 14), <https://www.alterpresse.org/spip.php?article31012> (confirming that l’Hôpital Universitaire de la Paix is the only “major public hospital and referral center that has kept its doors open throughout the crisis”).

⁴¹⁰ BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 55 (“In the Port-au-Prince metropolitan area, as of June, only 18 per cent of health institutions were functional, while 37 per cent were working at reduced capacity and 45 per cent were no longer functional.”). See also Celestin, *No accommodations available for pregnant women from Furcy to downtown* (Nov. 21, 2024) (“For several months, all major hospitals in Port-au-Prince, both public and private, have been shut down. Iconic medical structures, such as the Chancernelles Hospital and those run by the DASH network, have been destroyed or abandoned due to ongoing violence. . . . ‘The population no longer has access to care.’”); Jean Daniel Sénat, *Garry Conille: “The Haitian Crisis Has Been Grossly Underestimated,”* *Le Nouvelliste* (Sep. 23, 2024), <https://lenouvelliste.com/en/article/250437/garry-conille-the-haitian-crisis-has-been-grossly-underestimated> (more than 70% of health infrastructure in the metropolitan region of Port-au-Prince is out of service); UNICEF, *Humanitarian catastrophe in Haiti requires urgent international action, aid officials say* (Jul. 16, 2024), <https://www.unicef.org/haiti/en/press-releases/humanitarian-catastrophe-haiti-requires-urgent-international-action-aid-officials> (as of July, nearly 40 per cent of all in-patient health facilities are out of service in Port-au-Prince).

⁴¹¹ OCHA, *Haiti – Advocacy note for the immediate mobilization of resources, August 2024* (Aug. 21, 2024), p. 3; Juhakenson Blaise, *Haitian PM Garry Conille escapes gang attack at general hospital*, *Haitian Times* (Jul. 30, 2024), <https://haitiantimes.com/2024/07/30/convoy-haitian-prime-minister-fled-general-hospital-hueh/> (although the PNH regained control of the hospital, violence by armed groups in the vicinity persists); Charles & Fils-Aimé, *Video shows Haiti’s largest public hospital, which has been ravaged by gangs* (Jul. 12, 2024) (“Despite Haitian police’s triumphant declaration this week that they have resumed control of the hospital from powerful armed gangs, the area surrounding it remains an almost ghost-town.”).

⁴¹² UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 21. See also RHI News, *Le système de santé de la capitale haïtienne “au bord du gouffre”-ONU...* (Jun. 30, 2024) (reporting in June that just 25% of health facilities in the Artibonite Department were functional).

⁴¹³ OHCHR, *Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns* (Sep. 20, 2024). See also PAHO, *Public Health Situation Analysis – Haiti* (Oct. 4, 2024), p. 4 (“By April 2023, the Haitian Ministry of Public Health and Population . . . reported that 21% of communal sections did not have any healthcare facilities.”); RHI News, *Le système de santé de la capitale haïtienne “au bord du gouffre”-ONU...* (Jun. 30, 2024) (“Haiti’s health ministry estimates that nearly 40 percent of facilities offering treatment beds, including the country’s main university hospital, have closed in the past two months due to insecurity and looting, mainly by gangs.”); OCHA, *Global Humanitarian Overview 2024, Mid-Year Update* (May 31, 2024), p. 11 (as of May 31, only 20% of primary hospitals were functioning in the country).

⁴¹⁴ MSF, *Haiti: Violence and threats by police force MSF to suspend activities in Port-au-Prince area* (Nov. 19, 2024), <https://www.doctorswithoutborders.org/latest/haiti-violence-and-threats-police-force-msf-suspend-activities-port-au-prince-area> (on five separate occasions, police stopped MSF ambulances and threatened to kill, rape, and burn MSF staff, patients, and ambulances); MSF, *MSF outraged by police attack on ambulance and execution of patients in Haiti* (Nov. 13, 2024) (police and members of a civilian self-defense groups stopped an MSF ambulance, attacked MSF staff, and executed two wounded patients); Jacqueline Charles, *French medical charity suspends services in Haiti; cites death threats, attacks by police*, *Miami Herald* (Nov.

19, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article295826254.html> (the closures are “leaving Haitians with a loss of over 120 beds and the capacity to treat the massive influx of trauma cases happening amid an alarming rise in gang violence.”). See also Lay, *Kidnappers took his staff, then his son. But this Haitian doctor is refusing to flee* (Nov. 15, 2024) (one doctor did “not allow shooting injuries to be treated at his clinics, wary of being seen to take sides should police arrive”); MSF, *MSF denounces obstruction of ambulance* (Sep. 5, 2024), <https://www.doctorswithoutborders.org/latest/haiti-msf-denounces-obstruction-ambulance> (police roadblocks blocked an MSF ambulance carrying a patient in critical condition for over an hour, resulting in the death of the patient).

⁴¹⁵ Péliissier & Louis-Jeune, *The humanitarian crisis is worsening in Haiti* (Nov. 26, 2024) (“At La Paix hospital, the only major public hospital still in operation, gunshot wound cases are exploding. In one week in November, the hospital recorded 49 gunshot wounds, including one death.”); Haiti Libre, *Haiti – FLASH : Nearly 500% increase in gunshot wounds in 4 days* (Nov. 15, 2024), <https://www.haitilibre.com/en/news-43636-haiti-flash-nearly-500-increase-in-gunshot-wounds-in-4-days.html>. See also PAHO, *Public Health Situation Analysis – Haiti* (Oct. 4, 2024), p. 1 (“According to the UN, two out of every five Haitians urgently need medical care”).

⁴¹⁶ Jonasson Odigène, *Visits at La Paix University Hospital Rise by 200%, Putting Pressure on Medical Staff*, Le Nouvelliste (Nov. 22, 2024), <https://lenouvelliste.com/en/article/251592/visits-at-la-paix-university-hospital-rise-by-200-putting-pressure-on-medical-staff>; Phillips & Côté-Paluck, *‘It’s indescribable’: the hospital on the frontline of Haiti’s devastating gang war* (Nov. 9, 2024); Claudy Junior Pierre, *Aftermath of Pont Sonde: Saint-nicolas Hospital in Saint-Marc Counts 23 Injuries and 5 Deaths*, Le Nouvelliste (Oct. 7, 2024), <https://lenouvelliste.com/en/article/250721/aftermath-of-pont-sonde-saint-nicolas-hospital-in-saint-marc-counts-23-injuries-and-5-deaths> (“Saint-Nicolas Hospital was struggling due to escalating violence in Lower Artibonite. Many healthcare centers in areas controlled by the Gran Grif gang in Savien have shut down, with healthcare professionals fleeing the area. For at least the past nine months, Saint-Nicolas Hospital has often had to handle victims from gang attacks alone.”); France24, *Victims of Haiti’s gangs face health system in crisis* (Jun. 25, 2024) (Hôpital La Paix exceeded its capacity “a long time ago” but continues to take in patients as other hospitals are forced to close their doors). See also Lay, *Kidnappers took his staff, then his son. But this Haitian doctor is refusing to flee* (Nov. 15, 2024) (“Haiti’s remaining acute hospitals treat gunshot wounds on a daily basis.”).

⁴¹⁷ Phillips & Côté-Paluck, *‘It’s indescribable’: the hospital on the frontline of Haiti’s devastating gang war* (Nov. 9, 2024) (according to a doctor working in MSF’s Turgeau Emergency Center, “the injured sometimes took up to 12 hours to reach the emergency room . . . since they were unable to leave home to seek treatment”); GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 2* (Nov. 2024), p. 12; Celestin, *No accommodations available for pregnant women from Furcy to downtown* (Nov. 21, 2024); Charles & Fils-Aimé, *Video shows Haiti’s largest public hospital, which has been ravaged by gangs* (Jul. 12, 2024); AP News, *Newly chosen Haitian prime minister discharged from a hospital after spending a night in treatment* (Jun. 9, 2024), <https://apnews.com/article/haiti-prime-minister-hospital-6b497fe53549f6a943d3268eadd502d7> (“[D]octors are forced to stay at home on some days to avoid dangerous clashes between gangs.”); IOM, *Haiti — Summary of results from assessment of suicidal behavior in the Metropolitan Area of Port-au-Prince and recommendations for suicide prevention* (Mar. 2024), p. 4. See also PAHO, *Public Health Situation Analysis – Haiti* (Oct. 4, 2024), p. 4 (“By April 2023, the Haitian Ministry of Public Health and Population . . . reported that . . . nearly half of the hospitals in the Metropolitan Area of Port-au-Prince (MAPAP) were in areas under gang control or influence which put both medical staff and patients at great risk.”).

⁴¹⁸ International Committee of the Red Cross (ICRC), *Haiti: Under chronic stress and in constant fear, health workers strive to save lives* (Oct. 9, 2024), <https://www.icrc.org/en/article/haiti-under-chronic-stress-and-constant-fear-health-workers-strive-save-lives>.

⁴¹⁹ ICRC, *Haiti: Under chronic stress and in constant fear, health workers strive to save lives* (Oct. 9, 2024); PAHO, *Humanitarian crisis: PAHO/WHO supports the Programme National de Sécurité Transfusionnelle (PNST) in Haiti* (Sep. 27, 2024), <https://www.paho.org/en/news/27-9-2024-humanitarian-crisis-pahowho-supports-programme-national-securite-transfusionnelle>.

⁴²⁰ ICRC, *Haiti: Under chronic stress and in constant fear, health workers strive to save lives* (Oct. 9, 2024); U.S. Government Accountability Office (GAO), *Caribbean Firearms: Agencies Have Anti-Trafficking Efforts in Place, But State Could Better Assess Activities*, p. 1 (Oct. 2024), <https://www.gao.gov/assets/gao-25-107007.pdf>; Wilentz, *JD Vance’s Slanders Are Far From the Worst Thing the US Has Done to Haitians* (Sep. 11, 2024); RHI News, *‘Le nombre de personnes déplacées en Haiti a augmenté de 60 % depuis mars’-OIM...* (Jun. 19, 2024), <https://www.rhinews.com/actualites/le-nombre-de-personnes-deplacees-en-haiti-a-augmente-de-60-depuis-mars-oim/>. According to information shared by a network of healthcare organizations operating in Haiti, mobile clinics in the Centre Department are unable to operate due to a lack of medications.

⁴²¹ Wilentz, *JD Vance’s Slanders Are Far From the Worst Thing the US Has Done to Haitians* (Sep. 11, 2024); Charles & Fils-Aimé, *Video shows Haiti’s largest public hospital, which has been ravaged by gangs* (Jul. 12, 2024); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 55; France24, *Victims of Haiti’s gangs face health system in crisis* (Jun. 25, 2024) (fuel shortages and resulting power outages make getting x-rays extremely difficult – one woman who was shot in the head was unable to get an x-ray for at least three months).

⁴²² Charles & Fils-Aimé, *Video shows Haiti’s largest public hospital, which has been ravaged by gangs* (Jul. 12, 2024); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 55; RHI News, *‘Le système de santé de la capitale haïtienne “au bord du gouffre”-ONU...* (Jun. 30, 2024); Critical Values, *Haiti Laboratories Desperately Need Equipment and Volunteers* (Sep. 5, 2024), <https://criticalvalues.org/news/all/2024/09/05/haiti-laboratories-desperately-need-equipment-and-volunteers>.

⁴²³ Pierre, *Transition Period Puts Haiti’s Healthcare System to the Test* (Nov. 13, 2024); Jonasson Odigèn, *Haitian Pharmacists Association Criticizes Excessive Taxes on Locally Made Medicines*, Le Nouvelliste (Sep. 27, 2024), <https://lenouvelliste.com/en/article/250510/haitian-pharmacists-association-criticizes-excessive-taxes-on-locally-made-medicines> (“Laboratories have been forced to suspend their production, pharmaceutical agencies have been looted, pharmacies and drug

distribution depots have been set on fire, and the Faculty of Medicine and Pharmacy, which trains pharmacists, has been vandalized.”); Project Hope, *Haiti: Health Needs Across the Country Are Becoming Increasingly Urgent* (Sep. 9, 2024), <https://www.projecthope.org/news-stories/press-release/haiti-health-needs-becoming-increasingly-urgent/>; RHI News, *‘Le système de santé de la capitale haïtienne “au bord du gouffre”-ONU...’* (Jun. 30, 2024); AP News, *Newly chosen Haitian prime minister discharged from a hospital after spending a night in treatment* (Jun. 9, 2024).

⁴²⁴ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 43 (due to “[t]he lack of State presence in many areas of the capital. . . . gangs extort businesses, schools and health centres, where they also have the power to dictate their functioning”). See also note 356.

⁴²⁵ PAHO, *Public Health Situation Analysis – Haiti* (Oct. 4, 2024), p. 5; Edxon Francisque, *Healthcare Crisis in Fort Liberté: specialist’s death exposes once again critical equipment shortage at hospital*, Haitian Times (Sep. 16, 2024), <https://haitiantimes.com/2024/09/16/fort-liberte-hospital-mismanagement-and-the-death-of-dr-paul-rousseau-casseus/>; RHI News, *‘Le système de santé de la capitale haïtienne “au bord du gouffre”-ONU...’* (Jun. 30, 2024).

⁴²⁶ France24, *Victims of Haiti’s gangs face health system in crisis* (Jun. 25, 2024) (“[B]udget constraints have forced the hospital [La Paix] -- a public facility -- to charge patients for medical equipment. ‘We try to do as much as possible to give free emergency care... but once emergency care is over, if you come in for surgery, you don’t pay the surgeon, but all the materials you’ll need, you’re going to have to buy.’”).

⁴²⁷ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 53 (“Health centres in the South, South-East, Nippes and GrandAnse Departments, which are experiencing a significant influx of internally displaced persons from the West Department, are struggling to sustain current demands, jeopardizing their ability to provide care.”); Edxon Francisque, *Residents in northeastern Haiti struggle to find care amid inadequacies in healthcare system*, Haitian Times (Jul. 23, 2024), <https://haitiantimes.com/2024/07/23/hopital-haiti-ouanaminthe/> (under-staffing and under-resourcing at hospitals in the Northeast Department “highlight the inadequacies across the healthcare system”); Francisque, *Haiti’s northeast sees new challenges and opportunities as displaced residents settle in* (Jul. 3, 2024).

⁴²⁸ OCHA, *Haiti – Advocacy note for the immediate mobilization of resources, August 2024* (Aug. 21, 2024), p. 2; Francisque, *Haiti’s northeast sees new challenges and opportunities as displaced residents settle in* (Jul. 3, 2024).

⁴²⁹ Francisque, *Residents in northeastern Haiti struggle to find care amid inadequacies in healthcare system* (Jul. 23, 2024).

⁴³⁰ HRW, *Haiti: Scarce Protection as Sexual Violence Escalates* (Nov. 25, 2024) (“Haitian authorities have also undermined and underfunded state institutions responsible for providing essential services and protecting human rights. . . . Haiti is one of only 16 countries that spent less on public health care in 2021 than it did in 2000.”); UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 21 (noting “years of underinvestment”); World Bank, *Climate and Health Vulnerability Assessment: Haiti* (2024), ¶¶ 83-85, 94-97. See also EqualHealth’s Campaign Against Racism, *U.S. occupation of Haiti means health care is structured around extractive economic needs*, Prism (Oct. 15, 2024), <https://prismreports.org/2024/10/15/u-s-haiti-occupation-creates-healthcare-scarcity/> (detailing the impact of U.S. interference on access to health).

⁴³¹ Francisque, *Residents in northeastern Haiti struggle to find care amid inadequacies in healthcare system* (Jul. 23, 2024) (“Since gang-fueled insecurity has exacerbated Haiti’s crisis, many doctors, nurses, medical assistants, and certified technicians have left the region either to join their families abroad—notably in the United States under the humanitarian parole program, also known as the Biden Program—and Canada, or to work in the neighboring Dominican Republic for better pay and conditions.”); RHI News, *‘Le système de santé de la capitale haïtienne “au bord du gouffre”-ONU...’* (Jun. 30, 2024) (“UNICEF estimates that about 40 percent of health care providers have left the country recently ‘due to extreme levels of insecurity.’”); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 55 (40,000 healthcare workers have left the country). See also note 474.

⁴³² Francisque, *Residents in northeastern Haiti struggle to find care amid inadequacies in healthcare system* (Jul. 23, 2024) (“Some medical professionals also left the healthcare system altogether to join international organizations for better pay and benefits.”).

⁴³³ Rebecca Bruny & Widlore Mérancourt, *Women with breast cancer face major obstacles in Haiti*, Ayibo Post (Jul. 23, 2024), <https://ayibopost.com/women-with-breast-cancer-face-major-obstacles-in-haiti/> (“Only ‘three medical oncologists, two radiation oncologists and four surgical oncologists practice in Haiti,’ . . . [a]nd all these specialists work in the private sector.”); Francisque, *Residents in northeastern Haiti struggle to find care amid inadequacies in healthcare system* (Jul. 23, 2024) (“Saint Joseph Hospital, the largest in the [Northeast] department, does not have, among other departments of medical service, orthopedics, pediatrics, ophthalmology, dermatology and odontology.”).

⁴³⁴ Odigène, *Visits at La Paix University Hospital Rise by 200%, Putting Pressure on Medical Staff* (Nov. 22, 2024) (Hôpital universitaire de la Paix has lost 27% of its staff); PAHO, *Public Health Situation Analysis – Haiti* (Oct. 4, 2024), p. 4 (“With a national ratio of 6.4 health professionals (doctors, nurses, and midwives) per 10,000 population, [Haiti is] very far from the threshold of 44.5 per 10,000 required to achieve the Sustainable Development Goals.”); Haiti Libre, *Haiti – Health : 45% fewer Community Health Workers in the South...* (Sep. 23, 2024), <https://www.haitilibre.com/en/news-43268-haiti-health-45-fewer-community-health-workers-in-the-south.html> (45% of multi-skilled community health workers in the South Department and nearly 20% in the Grand’Anse Department have left the sector); World Bank, *Climate and Health Vulnerability Assessment: Haiti* (2024), ¶¶ 80-82; BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 55.

⁴³⁵ GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 2* (Nov. 2024), p. 12; PAHO, *Public Health Situation Analysis – Haiti* (Oct. 4, 2024), pp. 11-12; Daniela Mohor, *Intimate accounts of life in Haiti from a ‘fixer’ for foreign journalists*, The New Humanitarian (Sep. 30, 2024), <https://www.thenewhumanitarian.org/feature/2024/09/30/intimate-accounts-life-haiti-fixer-foreign-journalists>; Haitian Times, *Mental health emerges as top concern for Haitians amid ongoing crisis in Port-au-Prince, new survey reveals* (Aug. 12, 2024), <https://haitiantimes.com/2024/08/12/mental-health-haitians/> (a survey that “gathered responses from over 1,000 individuals across all ten departments of Haiti, found that psychological support is a top priority for

the population, alongside security, education, and economic stability”); Global Protection Cluster, [Protection of internally displaced persons in Haiti](#) (May 2024), p. 5. See generally IOM, [Haiti — Summary of results from assessment of suicidal behavior in the Metropolitan Area of Port-au-Prince and recommendations for suicide prevention](#) (Mar. 2024).

⁴³⁶ See generally IOM, [Haiti — Summary of results from assessment of suicidal behavior in the Metropolitan Area of Port-au-Prince and recommendations for suicide prevention](#) (Mar. 2024). See also REGAH HAITI, IDEJEN & UN Women, [Addressing Haitian women’s particular needs through their leadership role](#) (Jul. 2024), ¶ 5 (“69.8 per cent of women and 63.3 per cent of men [living in IDP camps] said they were mentally affected by the upsurge in violence in early 2024. Additionally, 70.8 per cent of those surveyed have emotional problems due to the scale of the violence, and 85.7 per cent live with feelings of sadness, anger, and despair about the outcome of the crisis.”); Global Protection Cluster, [Protection of internally displaced persons in Haiti](#) (May 2024), p. 5.

⁴³⁷ Save the Children, [Haiti’s Class Sizes Double as Mental Health Crisis Worsens Among Students](#) (Sep. 26, 2024). See notes

⁴³⁸ REGAH HAITI, IDEJEN & UN Women, [Addressing Haitian women’s particular needs through their leadership role](#) (Jul. 2024), ¶ 5 (nearly 70% of displaced women interviewed by UN Women reported being mentally impacted by the upsurge in violence).

⁴³⁹ GI-TOC, [Observatory of Violence and Resilience in Haiti: Issue 2](#) (Nov. 2024), p. 12; PAHO, [Public Health Situation Analysis – Haiti](#) (Oct. 4, 2024), pp. 7, 11-12; OCHA, [Haiti – Advocacy note for the immediate mobilization of resources, August 2024](#) (Aug. 21, 2024), p. 5 (projecting that without additional financial resources “[h]alf a million vulnerable children and victims of protection incidents will be deprived of mental health services and psychosocial support”); Claudy Junior Pierre, [La Fenatras lance un SOS pour le centre psychiatrique Mars and Klin](#), *Le Nouvelliste* (Jul. 12, 2024), <https://lenouvelliste.com/article/249110/la-fenatras-lance-un-sos-pour-le-centre-psychiatrique-mars-and-klin>; Claudy Junior Pierre, [The Ordeals of Psychiatric Patients: Security Issues and Medicine Shortfalls](#), *Le Nouvelliste* (Jul. 5, 2024), <https://lenouvelliste.com/en/article/248986/the-ordeals-of-psychiatric-patients-security-issues-and-medicine-shortfalls>; RHI News, [Le système de santé de la capitale haïtienne “au bord du gouffre”-ONU...](#) (Jun. 30, 2024); UN News, [Haiti faces record displacement amid escalating gang violence](#) (Jun. 20, 2024) (displaced persons lacks “safe and private spaces for psychological support”); IOM, [Haiti — Summary of results from assessment of suicidal behavior in the Metropolitan Area of Port-au-Prince and recommendations for suicide prevention](#) (Mar. 2024), p. 6; Global Protection Cluster, [Protection of internally displaced persons in Haiti](#) (May 2024), p. 5 (“The traumas endured by the Haitian population in general, and IDPs in particular, due to criminal violence and extremely precarious living conditions, are rarely addressed by humanitarian actors. The full extent of their impact remains largely unknown. Nearly no site has safe and private spaces to offer psychosocial support. The few partners providing such services prioritize group activities and are unable to offer more in-depth and individualized psychological assistance.”).

⁴⁴⁰ Pierre, [The Ordeals of Psychiatric Patients: Security Issues and Medicine Shortfalls](#) (Jul. 5, 2024) (“The absence of a public mental health policy, inconsistent training for neuropsychiatry specialists, and the overall neglect of psychiatric patients have compounded the suffering caused by the rampant insecurity in Haiti.”); IOM, [Haiti — Summary of results from assessment of suicidal behavior in the Metropolitan Area of Port-au-Prince and recommendations for suicide prevention](#) (Mar. 2024), p. 6 (“Successive governments have failed to make mental health a priority. For example, less than 10% of the national budget is allocated to health and 80% of this is allocated to the payment of salaries. As a result, the budget allocated to mental health represents less than 1% of the overall public health budget.”).

⁴⁴¹ Phillips & Côté-Paluck, [‘It’s indescribable’: the hospital on the frontline of Haiti’s devastating gang war](#) (Nov. 9, 2024); IOM, [Haiti — Summary of results from assessment of suicidal behavior in the Metropolitan Area of Port-au-Prince and recommendations for suicide prevention](#) (Mar. 2024), p. 4.

⁴⁴² IIDH, [Broken UN Promises Lead to Haiti Cholera Resurgence](#) (Oct. 11, 2022).

⁴⁴³ UNICEF, [Haiti Humanitarian Situation Report No. 6](#) (Jul. 2024), <https://reliefweb.int/report/haiti/unicef-haiti-humanitarian-situation-report-no-6-july-2024>. See also BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 53 (“Although the Government of Haiti has made significant strides in reducing the number of cholera cases with the assistance of national and international implementing partners, the Artibonite and Centre Departments continue to experience outbreaks.”).

⁴⁴⁴ World Bank, [Climate and Health Vulnerability Assessment: Haiti](#) (2024), ¶ 48.

⁴⁴⁵ World Bank, [Climate and Health Vulnerability Assessment: Haiti](#) (2024), ¶ 48.

⁴⁴⁶ ACAPS, [Haiti: Criminal gang violence in Port-au-Prince](#) (Jun. 6, 2024); Sanon, [Haitian prime minister tours Port au Prince hospital after police take back from gang control](#) (Jul. 9, 2024); OCHA, [Haiti – Advocacy note for the immediate mobilization of resources, August 2024](#) (Aug. 21, 2024), p. 6 (the Grand Sud is particularly impacted due to the influx of displaced persons and its vulnerability to natural disasters).

⁴⁴⁷ See notes 368-74 and associated text.

⁴⁴⁸ ACAPS, [Haiti: Impact of conflict on children and youth](#) (Sep. 30, 2024), p. 7.

⁴⁴⁹ See generally Ahmed D Elnaïem et al., [Food insecurity and risk of cholera: A cross-sectional study and exploratory analysis of potential mediators](#), *PLoS Negl Trop Dis.* (Feb. 2023), <https://pmc.ncbi.nlm.nih.gov/articles/PMC9934351/>. See also notes 381-91 and associated text.

⁴⁵⁰ Jérôme Wendy Norestyl, [3,000 schools closed in the West and Artibonite regions due to gangs](#), *Ayibo Post* (Nov. 21, 2024), <https://ayibopost.com/ouest-et-artibonite-3000-ecoles-fermees-a-cause-des-gangs/>; BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 39; Jacqueline Charles, [It’s back-to-school day in Haiti, but teachers have fled and the homeless occupy schools](#), *Miami Herald* (Oct. 1, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article293280214.html>; UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 21 (“In April and May 2024,

eight schools were looted or burned in Port-au-Prince, Gressier and Croix-des-Bouquets communes.”); Jonasson Odigène, *Montfort Institute, Serving the Deaf and Deaf-Blind, Attacked by Bandits*, *Le Nouvelliste* (Aug. 6, 2024), <https://lenouvelliste.com/en/article/249552/montfort-institute-serving-the-deaf-and-deaf-blind-attacked-by-bandits>; Adams, *Haitian press face ‘existential crisis’ with no end to gang violence* (Jul. 24, 2024) (“Several universities and hospitals, as well as the National Library of Haiti, have all been looted.”); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 58.

⁴⁵¹ Norestyl, *3,000 schools closed in the West and Artibonite regions due to gangs* (Nov. 21, 2024). See also *Le Nouvelliste, UN Highlights the Struggles of Its Humanitarian Efforts in Haiti* (Nov. 13, 2024), <https://lenouvelliste.com/en/article/251436/un-highlights-the-struggles-of-its-humanitarian-efforts-in-haiti> (reporting that “all schools in Port-au-Prince have closed”); AlterPresse, *Haiti-Éducation : Les violences des gangs ont provoqué la fermeture d’environ 400 écoles publiques et privées à Cabaret et Aracahaie* (Nov. 8, 2024), <https://www.alterpresse.org/spip.php?article31114>.

⁴⁵² OCHA, *Haiti – Advocacy note for the immediate mobilization of resources, August 2024* (Aug. 21, 2024), p. 7 (reporting 103 in the Artibonite Department and 816 in the West Department in August).

⁴⁵³ According to the IOM, schools represent 34 of the 95 active displacement sites in Port-au-Prince, and are occupied by over 55,000 displaced persons. IOM, *Haiti – Report on the internal displacement situation in Haiti – Round 8* (Sep. 2024), p. 11; Charles, *It’s back-to-school day in Haiti, but teachers have fled and the homeless occupy schools* (Oct. 1, 2024).

⁴⁵⁴ OCHA, *Haiti – Advocacy note for the immediate mobilization of resources, August 2024* (Aug. 21, 2024), p. 7; Evens Sanon, *UN fund warns of \$23 million deficit in Haiti’s education system as it announces grant*, AP News (Jul. 26, 2024), <https://apnews.com/article/haiti-schools-unicef-gangs-violence-ec01a46d012cfd7e3c5880b86589581d> (the principal of one school that has allowed displaced persons to sleep in the school says the situation “creates very bad hygienic problems”).

⁴⁵⁵ HRW, *Haiti: Criminal Violence, Hunger Trapping Children* (Oct. 9, 2024) (“Internally displaced people have occupied many Port-au-Prince schools, with no plan in place or resources allocated to reactivate them or relocate the displaced populations, a senior UN official said.”); Jonasson Odigène, *The Current State of Lycées in Areas No Longer Controlled by the Republic*, *Le Nouvelliste* (Oct. 11, 2024), <https://lenouvelliste.com/en/article/250851/the-current-state-of-lycees-in-areas-no-longer-controlled-by-the-republic>. See also Save the Children, *Haiti’s Class Sizes Double as Mental Health Crisis Worsens Among Students* (Sep. 26, 2024) (“[S]ome schools that have been used as shelters require extensive cleanup and repairs before they can fully resume educational activities.”).

⁴⁵⁶ OCHA, *Haiti – Advocacy note for the immediate mobilization of resources, August 2024* (Aug. 21, 2024), p. 1. See also BINUH, *Report of the Secretary General* (Oct. 15, 2024) at ¶ 62 (“In September, nearly 350,000 school-aged children were displaced, including 160,000 currently affected by school closures in the West and Artibonite Departments.”); UN News, *Haiti: Education in jeopardy as gang violence continues* (Sept. 11, 2024) (reporting the “severe strain on educational services” due to extensive displacement and school closures, affecting approximately 156,000 students, many of whom “lost a substantial portion of their academic year.”).

⁴⁵⁷ See, e.g., Sanon & Coto, *Haiti’s Justice Ministry warns of threats against the prime minister and his Cabinet* (Oct. 22, 2024) (armed groups opened fire near a school in the central town of Estere in October, “killing at least one parent and injuring a student”); BINUH, *Report of the Secretary-General* (Oct. 15, 2024) (“In August, a school for children with hearing and visual impairments, located in Croix-des-Bouquets, was stormed and looted by gangs while the children were inside.”).

⁴⁵⁸ Save the Children, *Haiti’s Class Sizes Double as Mental Health Crisis Worsens Among Students* (Sep. 26, 2024) (“For children living in areas with active fighting in Port-au-Prince, starting the new school year next week may not be possible, even if schools reopen. The journey to school in armed group-controlled areas poses significant risks, including being caught in the crossfire and the threat of recruitment into these groups.”).

⁴⁵⁹ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 43.

⁴⁶⁰ OCHA, *Haiti – Advocacy note for the immediate mobilization of resources, August 2024* (Aug. 21, 2024), p. 7 (according to the UN Office for the Coordination of Humanitarian Affairs, at least 207,000 additional school-age children and 4,000 teachers have been displaced by the insecurity since February).

⁴⁶¹ Save the Children, *Haiti’s Class Sizes Double as Mental Health Crisis Worsens Among Students* (Sep. 26, 2024); Duquereste & Phontus, *Schools in rural areas overwhelmed by influx of students from P-au-P* (Jun. 21, 2024); Francisque, *Haiti’s northeast sees new challenges and opportunities as displaced residents settle in* (Jul. 3, 2024); Charles, *It’s back-to-school day in Haiti, but teachers have fled and the homeless occupy schools* (Oct. 1, 2024).

⁴⁶² Sanon, *UN fund warns of \$23 million deficit in Haiti’s education system as it announces grant* (Jul. 26, 2024) (“Schools that remain operational are increasingly forced to take students from other institutions that have shuttered. The Jean Marie Vincent School in central Port-au-Prince, for example, has accepted students from a dozen other schools.”); Odigène, *The Current State of Lycées in Areas No Longer Controlled by the Republic* (Oct. 11, 2024) (“In La Saline, we had 16 classrooms. Now, we have only five. We had to combine classes just to save the school year.”); Save the Children, *Haiti’s Class Sizes Double as Mental Health Crisis Worsens Among Students* (Sep. 26, 2024) (“Save the Children’s local partners in Les Cayes report that internally displaced children will push class sizes to upwards of 80 students—more than double the recommended class size.”); Duquereste & Phontus, *Schools in rural areas overwhelmed by influx of students from P-au-P* (Jun. 21, 2024); Francisque, *Haiti’s northeast sees new challenges and opportunities as displaced residents settle in* (Jul. 3, 2024) (“The educational system in the northeast is also feeling the strain as the influx of nearly 170,000 displaced children, as reported by UNICEF, places unprecedented pressure on the region’s educational infrastructure. . . . ‘There aren’t enough benches or desks for everyone,’ one local teacher said. ‘Many students lack basic books and study materials, forcing them to share resources, which hampers their learning. When it rains, we often have to evacuate due to the poor condition of the roof.’”).

⁴⁶³ Save the Children, *Haiti’s Class Sizes Double as Mental Health Crisis Worsens Among Students* (Sep. 26, 2024).

⁴⁶⁴ Odigène, [The Current State of Lycées in Areas No Longer Controlled by the Republic](#) (Oct. 11, 2024). See also Francisque, [Daily gunfire plagues Ouanaminthe as stray bullets hit residents inside their homes](#) (Nov. 11, 2024) (one eight-year-old who was shot in the neck and unable to get surgery to remove the bullet has had difficulty learning and had to repeat a grade); Duquereste & Phontus, [Schools in rural areas overwhelmed by influx of students from P-au-P](#) (Jun. 21, 2024) (“[M]ost new arrivals come “without report cards, diplomas, or transcripts” from their previous schools.”).

⁴⁶⁵ Sanon, [UN fund warns of \\$23 million deficit in Haiti’s education system as it announces grant](#) (Jul. 26, 2024) (“Schools in Haiti’s capital and beyond are crumbling as gang violence deepens poverty and disrupts basic government services as the state education system faces a \$23 million deficit. . . . ‘A lot of schools are missing benches or chairs. Teachers do not show up on time. The hardest part of this is that there are no bathrooms.’”); Widlore Mérencourt, [Letter from the French ambassador to Haiti sparks debate](#), Ayibo Post (Jul. 15, 2024), <https://ayibopost.com/letter-from-the-french-ambassador-to-haiti-sparks-debate/> (barely 10% of the national budget is dedicated to education); Duquereste & Phontus, [Schools in rural areas overwhelmed by influx of students from P-au-P](#) (Jun. 21, 2024) (schools in the South Department that were damaged in the 2021 earthquake have yet to be repaired); Charles, [It’s back-to-school day in Haiti, but teachers have fled and the homeless occupy schools](#) (Oct. 1, 2024) (in one school in Jacmel, “[f]issures from the 2010 earthquake, more than 14 years ago, still have not been repaired and hundreds of desks and chairs that were ordered more than three years ago are still stuck in Port-au-Prince, three hours away, through gang-controlled territories”).

⁴⁶⁶ Norestyl, [3,000 schools closed in the West and Artibonite regions due to gangs](#) (Nov. 21, 2024) (just 525 out of 6,857 schools in the West Department are public, and 522 out of 2,621 in the Artibonite Department); Davis, [In Haiti, Gangs Recruit Kids Because They Can’t Go to School](#) (Aug. 14, 2024) (90% of Haiti’s schools are private); Sanon, [UN fund warns of \\$23 million deficit in Haiti’s education system as it announces grant](#) (Jul. 26, 2024) (“Private schools are out of reach for many in Haiti, a country of more than 11 million people, with more than 60% earning less than \$2 a day.”).

⁴⁶⁷ Save the Children, [Haiti’s Class Sizes Double as Mental Health Crisis Worsens Among Students](#) (Sep. 26, 2024); Duquereste & Phontus, [Schools in rural areas overwhelmed by influx of students from P-au-P](#) (Jun. 21, 2024) (“Parents, fleeing gang violence, are often unable to obtain essential school materials, such as books or shoes.”).

⁴⁶⁸ Charles, [It’s back-to-school day in Haiti, but teachers have fled and the homeless occupy schools](#) (Oct. 1, 2024) (“Prime Minister Garry Conille took to social media to share a graphic of the government’s ongoing efforts to help by providing 2 million free books in Creole and 20,000 gourdes — about \$150 — to 200,000 parents.”); Jean Junior Celestin, [Garry Conille: Security and Back-to-School are Key Government Priorities](#), Le Nouvelliste (Aug. 16, 2024), <https://lenouvelliste.com/en/article/249737/garry-conille-security-and-back-to-school-are-key-government-priorities> (the then-Prime Minister promised “to provide, for the first time, the necessary materials and instruments to two million students for the coming academic year”).

⁴⁶⁹ Sanon, [UN fund warns of \\$23 million deficit in Haiti’s education system as it announces grant](#) (Jul. 26, 2024) (“Another blow to Haitian schools was a program that the administration of U.S. President Joe Biden launched in late 2022 that allows Haitians and people from a handful of other countries to enter the U.S. on humanitarian grounds. ‘A lot of teachers left,’ said Frantz Erine, deputy principal at the Jean Marie Vincent School.”); Charles, [It’s back-to-school day in Haiti, but teachers have fled and the homeless occupy schools](#) (Oct. 1, 2024) (government-owned schools in the Southeast Department have 500 to 600 vacancies, including 250 teaching vacancies, including as a result of emigration). See also note 474.

⁴⁷⁰ Haiti Libre, [Haiti – Social : Increase in the number of illegal departure attempts by boat](#) (Jul. 21, 2024), <https://www.haitilibre.com/en/news-42811-haiti-social-increase-in-the-number-of-illegal-departure-attempts-by-boat.html> (“Insecurity, lack of economic opportunities, the collapse of the health system, the closure of schools and the absence of prospects push many to consider migration as the only way to survive.”); RHI News, [La situation en Haiti : Un pays toujours en quête de paix et de stabilité...](#) (Jun. 28, 2024), <https://www.rhinews.com/actualites/la-situation-en-haiti-un-pays-toujours-en-quete-de-paix-et-de-stabilite/> (“Massive population displacements, both internally and abroad, reflect desperation and the search for safety.”). See also Kristina Fried, [To Defend Haitian Migrants, Oppose the US Policies That Forced Them to Flee](#), Common Dreams (Oct. 17, 2024), <https://www.commondreams.org/opinion/haitian-migration-crisis-u-s>.

⁴⁷¹ Amnesty International, [Haiti: Oral statement: Item 10: Interactive dialogue with the High Commissioner on interim report on Haiti, with the participation of the human rights expert on Haiti](#) (Oct. 8, 2024); @ajplus, X (Jun. 11, 2024), <https://x.com/ajplus/status/1800489404773077446>; Bill Frelick, [Racist Rhetoric, Anti-Haitian Actions in the US Are No Joking Matter](#), HRW (Sep. 17, 2024), <https://www.hrw.org/news/2024/09/17/racist-rhetoric-anti-haitian-actions-us-are-no-joking-matter> (calling on politicians and the public to “confront the racism that colors US immigration and asylum policies”). See also Jonathan M. Katz, [Trump’s Anti-Haitian Hate Has Deep American Roots](#), New Republic (Sep. 16, 2024), <https://newrepublic.com/article/185909/trump-hatred-history-haitian-americans>. See also note 489.

⁴⁷² See notes 480-500.

⁴⁷³ See notes 486-87 and associated text.

⁴⁷⁴ See Sénat, [Garry Conille: “The Haitian Crisis Has Been Grossly Underestimated”](#) (Sep. 23, 2024) (former interim Prime Minister Conille: “Nearly 25% of public servants, including doctors, nurses, teachers, and police officers, have left the country. This brain drain further weakens the foundations of our society.”). See notes 125, 431, 469.

⁴⁷⁵ BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 64 (“In 2024, an estimated 2,829 Haitians have been encountered at sea based on 38 reported interceptions, often on overloaded vessels. If this trend continues until the end of the year, it will represent an increase of more than 50 per cent compared with 2023.”); Haiti Libre, [Haiti – Social : Increase in the number of illegal departure attempts by boat](#) (Jul. 21, 2024). See also GAO, [Caribbean Firearms: Agencies Have Anti-Trafficking Efforts in Place, But State Could Better Assess Activities](#) (Oct. 2024), pp. 1-2 (“Immigration to the U.S. from Haiti has dramatically increased in recent years, caused in part by widespread gang violence.”).

⁴⁷⁶ AlterPresse, [Situation toujours compliquée en Amérique latine et dans les Caraïbes, pour les migrantes et migrants en provenance d’Haïti, signale le Garr](#) (Jun. 26, 2024), <https://www.alterpresse.org/spip.php?article30611> (9,222 Haitian migrants crossed the dangerous Darién Gap in search of safety between January and May); Manuel Rueda, [Human rights group calls on](#)

governments to protect Venezuelan and Haitian immigrants, AP News (Sep. 11, 2024), <https://apnews.com/article/human-rights-venezuela-haiti-refugees-068a54a18ddb713cf5d969ba27ae30> (barriers to migration in Latin American states push Haitian migrants “to seek asylum in the U.S. and undertake perilous journeys, like crossing the dangerous Darién Gap”).

⁴⁷⁷ See, e.g., David C. Adams & James Wagner, *At Least 40 Migrants Die in Boat Fire Off Haitian Coast, U.N. Says*, NY Times (Jul. 19, 2024), <https://www.nytimes.com/2024/07/19/world/americas/boat-fire-haiti-migrants.html> (at least 40 Haitians were killed after a boat carrying over 80 migrants caught fire en route to Turks and Caicos in July, highlighting “the risks faced by children, women and men migrating through irregular routes, [and] demonstrating the crucial need for safe and legal pathways for migration,” according to the head of the IOM in Haiti); *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 120.

⁴⁷⁸ BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶¶ 33, 64 (“In 2024, an estimated 2,829 Haitians have been encountered at sea based on 38 reported interceptions, often on overloaded vessels. If this trend continues until the end of the year, it will represent an increase of more than 50 per cent compared with 2023.”); Adams & Wagner, *At Least 40 Migrants Die in Boat Fire Off Haitian Coast, U.N. Says* (Jul. 19, 2024) (“Since March, the U.N. migration agency said, the Haitian Coast Guard has observed an increase in the number of departures by boat. Coast Guards from countries in the region, including the United States, the Bahamas, Turks and Caicos and Jamaica, have also reported a growing number of boats originating from Haiti being intercepted at sea.”); Haiti Libre, *Haiti – Social : Increase in the number of illegal departure attempts by boat* (Jul. 21, 2024). See also David Goodhue & Jacqueline Charles, *More than 100 Haitian migrants land in Key West. They spent seven days at sea*, Miami Herald (Jun. 26, 2024), <https://www.miamiherald.com/news/local/community/florida-keys/article289543824.html> (increasing insecurity has made the journey from Port-au-Prince to Haiti’s northwest coast – the jumping off point for many migrants – incredibly treacherous).

⁴⁷⁹ See, e.g., UNSC, *Report of the UN Office on Drugs and Crime* (Oct. 16, 2024), ¶¶ 27-37; AP News, *Federal agents detain 64 Haitian migrants left stranded on an island near Puerto Rico* (Oct. 5, 2024), <https://apnews.com/article/haiti-migrants-stranded-mona-island-puerto-rico-f1172f4b299a06218be51a45273c3e72>; Jacqueline Charles, *Haiti fires most staff in its Suriname consulate over possible human-trafficking ring*, Miami Herald (Aug. 14, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article291054245.html>; Edxon Francisque, *A desperate crossing: Dominican army uses Haitian deportation for profit*, Haitian Times (Jul. 8, 2024), <https://haitiantimes.com/2024/07/08/dominican-migration-deportation-haitians/>; Evens Sanon, *Haitian activists demand halt to deportations as gang violence and poverty soar*, AP News (Nov. 7, 2024), <https://apnews.com/article/haiti-deportations-dominican-republic-us-0ca0f181119e7a44e52366185fd7754a>.

⁴⁸⁰ BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 54 (“Forced returns are continuing from the United States, the Dominican Republic and several neighbouring Caribbean islands, with a significant negative impact on Haitians in need of international protection.”); Haiti Libre, *Haiti – Turks and Caicos : 217 Haitian migrants intercepted and significant seizure of marijuana* (Aug. 20, 2024), <https://www.haitilibre.com/en/news-43025-haiti-turks-and-caicos-217-haitian-migrants-intercepted-and-significant-seizure-of-marijuana.html>; Renae Stamp, *Haitians repatriated less than 24 hrs after arriving in Jamaica*, Cayman Marl Road (Jul. 29, 2024), <https://caymanmarlroad.com/2024/07/29/haitians-repatriated-less-than-24-hrs-after-arriving-in-jamaica/>.

⁴⁸¹ HRW, *Rights Groups Oppose Recent Remarks Targeting the Haitian Immigrant Community* (Oct. 1, 2024), <https://www.hrw.org/news/2024/10/01/rights-groups-oppose-recent-remarks-targeting-haitian-immigrant-community> (291 immigrants’ rights, civil rights, worker rights, racial justice, cultural, and faith-based organizations called for a “moratorium on deportations by air or sea to Haiti”); Jean Daniel Sénat, *GARR Condemns Abinader Administration’s Plan to Deport 10,000 Haitians per Week*, Le Nouvelliste (Oct. 2, 2024), <https://lenouvelliste.com/en/article/250626/garr-condemns-abinader-administrations-plan-to-deport-10000-haitians-per-week> (the *Groupe d’Appui aux Rapatriés et Réfugiés* (Support Group to Returnees and Refugees), a Haitian migrants’ rights organization, emphasized that mass deportations from the Dominican Republic “violate human rights and the Inter-American Convention on Human Rights”); Haitian Bridge Alliance (HBA), *Haitian Bridge Alliance welcomes and applauds Biden’s extension and redesignation of Haiti for TPS and urges Congress to pass comprehensive immigration reform* (Jun. 28, 2024), <https://haitianbridgealliance.org/haitian-bridge-alliance-welcomes-and-applauds-bidens-extension-and-redesignation-of-haiti-for-tps-and-urges-congress-to-pass-comprehensive-immigration-reform/> (“Deportations to Haiti from the United States are intentional violence and blatant disregard for Haitian lives and deeply rooted in anti-Black discrimination.”); Amnesty International, *Amnesty International USA Reaction to the Biden Administration’s Decision to Extend and Redesignate Haiti for TPS* (Jun. 28, 2024), <https://www.amnestyusa.org/press-releases/amnesty-international-usa-reaction-to-the-biden-administrations-decision-to-extend-and-redesignate-haiti-for-tps/> (“[T]he administration should . . . halt all deportations and maritime interdictions that end in forced returns to Haiti, and immediately restore access to asylum to those arriving by land and sea.”); Amnesty International, *President Luis Abinader’s second mandate must prioritize respect for human rights and put an end to racist migration policies* (Aug. 28, 2024), <https://www.amnesty.org/en/latest/news/2024/08/president-luis-abinaders-second-mandate-must-prioritize-respect-human-rights-end-racist-migration-policies/> (“Amnesty International has found that many of these deportations [from the Dominican Republic] have been collective expulsions, in violation of the principle of non-refoulement and the right to asylum of Haitian nationals.”); Sanon, *Haitian activists demand halt to deportations as gang violence and poverty soar* (Nov. 7, 2024); Natricia Duncan, *Stop ‘draconian’ mass deportations of Haitians fleeing gangs, activists say*, The Guardian (Nov. 14, 2024), <https://www.theguardian.com/world/2024/nov/14/haiti-mass-deportation> (international human rights lawyer Malene Alleyne criticized Jamaica’s “draconian approach that’s based on collective expulsion without assessing in an individualised way [Haitian migrants’] protection needs and their risk of persecution on their return to Haiti”); American Jewish World Service (AJWS), *AJWS statement on the Dominican Republic’s mass deportations to Haiti* (Nov. 18, 2024), <https://ajws.org/press-releases/ajws-statement-on-the-dominican-republics-mass-deportations-to-haiti/>.

⁴⁸² Clarke and Haiti Caucus Condemn Violence in Haiti, renew calls for Biden admin. to halt deportations (Nov. 14, 2024), <https://clarke.house.gov/clarke-and-haiti-caucus-condemn-violence-in-haiti-renew-calls-for-biden-admin-to-halt-deportations/> (Haiti Caucus Co-Chairs Yvette D. Clarke, Congresswomen Ayanna Pressley, and Sheila Cherfilus-McCormick called on “the Biden-Harris Administration to immediately halt all deportations”).

⁴⁸³ Syra Ortiz Blanes & Jacqueline Charles, *DHS resumes Haiti deportations to gang-ridden Port-au-Prince*, Miami Herald (Oct. 8, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article291615710.html> (“Citing the ongoing gang violence and humanitarian crisis, the U.N. has stressed that countries should not send people back to Haiti and its Commission on Human Rights specifically asked the U.S. to halt deportation flights.”).

⁴⁸⁴ UNICEF, *Haiti: Humanitarian Situation Report No. 9* (Oct. 2024), <https://www.unicef.org/media/165571/file/Haiti-Humanitarian-SitRep-October-2024.pdf>. See also PAHO, *Public Health Situation Analysis – Haiti* (Oct. 4, 2024), p. 3 (“[N]early 17,300 Haitian migrants were forcibly returned from neighbouring countries in July 2024”); UNHCR, *Haiti Factsheet* (Jul. 2024) (“in the second quarter of 2024 almost 50,000 Haitians were forcibly returned to Haiti by different countries”).

⁴⁸⁵ Francisque, *A desperate crossing: Dominican army uses Haitian deportation for profit*, Haitian Times (Jul. 8 2024); Amnesty International, *President Luis Abinader’s second mandate must prioritize respect for human rights and put an end to racist migration policies* (Aug. 28, 2024) (between January and August, Dominican authorities removed 98,594 Haitians). See also Coto, *Dominican president warns of ‘drastic measures’ if anti-gang mission in Haiti fails* (Sep. 25, 2024) (Dominican authorities removed up to 224,000 Haitians in 2023, although according to Dominican government data, the number is closer to 170,000).

⁴⁸⁶ AP News, *Dominican Republic will deport up to 10,000 Haitians a week, citing an ‘excess’ of immigrants* (Oct. 2, 2024), <https://apnews.com/article/dominican-republic-haiti-immigrants-deportations-25a82fdefe7a51bff32e8215d10089f4>; BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 64.

⁴⁸⁷ Sanon, *Haitian activists demand halt to deportations as gang violence and poverty soar* (Nov. 7, 2024). See also AP News, *Dominican Republic starts mass deportations of Haitians and expels nearly 11,000 in a week* (Oct. 8, 2024), <https://apnews.com/article/dominican-republic-deportations-haiti-0e46f10ca79a34d05f9ff0cf5e00a971> (Dominican officials removed nearly 11,000 Haitians in the first week after their announcement); Gabrielle Apollon, *In a Climate of Slander and Haiti, Haitian Immigrants Organize Across Border*, NACLA (Oct. 24, 2024), <https://nacla.org/slander-hate-haitian-immigrants-organize-across-borders> (Dominican officials removed over 27,000 people to Haiti between October 2 and 24); BINUH, *Report of the Secretary-General* (Oct. 15, 2024), ¶ 64 (as of October 15, “IOM has reported 9,369 forced returns (including 1,307 women and 307 children) since the Council’s decision.”); Haiti Libre, *Haiti – FLASH : 7,217 Haitians deported and repatriated to Haiti in 4 days by the Dominican Republic* (Oct. 8, 2024), <https://www.haitilibre.com/en/news-43371-haiti-flash-7-217-haitians-deported-and-repatriated-to-haiti-in-4-days-by-the-dominican-republic.html>.

⁴⁸⁸ ACAPS, *Haiti: Humanitarian impact of increased deportations from the Dominican Republic*, pp. 4-5 (Nov. 26, 2024), https://www.acaps.org/fileadmin/Data_Product/Main_media/20241126_ACAPS_Haiti-Humanitarian_impact_of_increased_deportations_from_the_Dominican_Republic.pdf; AJWS, *AJWS statement on the Dominican Republic’s mass deportations to Haiti* (Nov. 18, 2024).

⁴⁸⁹ Amnesty International, *President Luis Abinader’s second mandate must prioritize respect for human rights and put an end to racist migration policies* (Aug. 28, 2024) (the mass removals “are being carried out by migration officials on the basis of racial profiling and discrimination, thus failing to guarantee the principle of equality and non-discrimination”); AP News, *Dominican Republic starts mass deportations of Haitians and expels nearly 11,000 in a week* (Oct. 8, 2024) (Haitian permanent representative to the Organization of American States Gandy Thomas “called the deportations ‘a strategy of ethnic cleansing’ and ‘a discriminatory campaign against Haitians due to their nationality and color of their skin.’”). See also ACAPS, *Haiti: Humanitarian impact of increased deportations from the Dominican Republic* (Nov. 26, 2024), p. 4 (“[M]any deportations since the end of 2022 have been collective expulsions that do not involve the individual assessment of cases nor provide opportunities for migrants to seek international protection”).

⁴⁹⁰ Apollon, *In a Climate of Slander and Haiti, Haitian Immigrants Organize Across Border* (Oct. 24, 2024) (“Dominican authorities appear to be primarily relying on racial profiling to carry out the deportation campaign, as Black Dominicans, Dominicans of Haitian descent, and Haitians with legal immigration statuses have consistently been swept up in raids and detained.”); Jean Junior Celestin, *Mass Deportations in the Dominican Republic Spark Outrage*, Le Nouvelliste (Oct. 7, 2024), <https://lenouvelliste.com/en/article/250736/mass-deportations-in-the-dominican-republic-spark-outrage> (“Dominican immigration agents appear to be primarily targeting Black individuals, including Dominicans of Haitian descent, a group already vulnerable since the controversial 2013 ruling that stripped thousands of their Dominican nationality.”); Amnesty International, *President Luis Abinader’s second mandate must prioritize respect for human rights and put an end to racist migration policies* (Aug. 28, 2024) (finding that mass expulsions “are being carried out by migration officials on the basis of racial profiling and discrimination”).

⁴⁹¹ Francisque, *A desperate crossing: Dominican army uses Haitian deportation for profit*, Haitian Times (Jul. 8 2024); Edxon Francisque, *Haitian migrants expelled from the Dominican Republic face dire conditions as committee struggles with lack of resources*, Haitian Times (Oct. 24, 2024), <https://haitiantimes.com/2024/10/24/haitian-deportation-immigration-inhumanely/>; Celestin, *Mass Deportations in the Dominican Republic Spark Outrage* (Oct. 7, 2024).

⁴⁹² ACAPS, *Haiti: Humanitarian impact of increased deportations from the Dominican Republic* (Nov. 26, 2024), p. 4; Francisque, *A desperate crossing: Dominican army uses Haitian deportation for profit*, Haitian Times (Jul. 8 2024); AlterPresse, *Situation toujours compliquée en Amérique latine et dans les Caraïbes, pour les migrantes et migrants en provenance d’Haïti, signale le Garr* (Jun. 26, 2024); Celestin, *Mass Deportations in the Dominican Republic Spark Outrage* (Oct. 7, 2024); AlterPresse, *Haïti-Rép. Dominicaine : Arrêtée, une migrante souffrante meurt en chemin de sa déportation vers Haïti, dénonce le Garr* (Jul. 7, 2024), <https://www.alterpresse.org/spip.php?article30647>; Apollon, *In a Climate of Slander and Haiti, Haitian Immigrants Organize Across Border* (Oct. 24, 2024).

⁴⁹³ ACAPS, *Haiti: Humanitarian impact of increased deportations from the Dominican Republic* (Nov. 26, 2024), p. 4; Francisque, *Haitian migrants expelled from the Dominican Republic face dire conditions as committee struggles with lack of resources* (Oct. 24, 2024) (reporting that bribes range from 1,000 pesos (US\$19) to 10,000 pesos (US\$192), and that women are facing “infectious diseases as a result of rape and sexual violence suffered during their deportation”); Rezo Nodwes, *NEHRO et*

d'autres organisations appelant la CIDH à agir contre les abus en République dominicaine (Oct. 18, 2024), <https://rezonodwes.com/?p=344594>; AlterPresse, *Situation toujours compliquée en Amérique latine et dans les Caraïbes, pour les migrantes et migrants en provenance d'Haïti, signale le Garr* (Jun. 26, 2024); Jean Junior Celestin, *Migratory Crisis: SJM Condemns Widespread Rights Violations of Haitian Migrants at Dominican Border*, Le Nouvelliste (Oct. 14, 2024), <https://lenouvelliste.com/en/article/250877/migratory-crisis-sjm-condemns-widespread-rights-violations-of-haitian-migrants-at-dominican-border>; Apollon, *In a Climate of Slander and Haiti, Haitian Immigrants Organize Across Border* (Oct. 24, 2024); Sanon, *Haitian activists demand halt to deportations as gang violence and poverty soar* (Nov. 7, 2024).

⁴⁹⁴ Celestin, *Mass Deportations in the Dominican Republic Spark Outrage* (Oct. 7, 2024); AlterPresse, *Haïti-Rép. Dominicaine : Arrêtée, une migrante souffrante meurt en chemin de sa déportation vers Haïti, dénonce le Garr* (Jul. 7, 2024).

⁴⁹⁵ AlterPresse, *Haïti-Rép. Dominicaine : Arrêtée, une migrante souffrante meurt en chemin de sa déportation vers Haïti, dénonce le Garr* (Jul. 7, 2024).

⁴⁹⁶ ACAPS, *Haiti: Humanitarian impact of increased deportations from the Dominican Republic* (Nov. 26, 2024), p. 5 (“Most Haitians deported in October 2024 had no resources or identity documentation upon arrival in Haiti. This leaves them vulnerable to the denial of healthcare, education, shelter, and other basic services. In some parts of Haiti, authorities suspect people without documentation of gang membership, which may lead to their arrest or rejection from host communities”); Celestin, *Mass Deportations in the Dominican Republic Spark Outrage* (Oct. 7, 2024).

⁴⁹⁷ The U.S. Department of State has issued a Do Not Travel advisory “due to kidnapping, crime, civil unrest, and limited health care.” Following violence in October, the U.S. government evacuated 20 staff from its Port-au-Prince embassy, and the embassy suspended operations temporarily in November due to further violence. @USEmbassyHaiti, X (Nov. 20, 2024), <https://x.com/USEmbassyHaiti/status/1859228139089506519>; U.S. Embassy in Haiti, *Security Alert, U.S. Embassy, Port-au-Prince, Haiti* (Nov. 11, 2024), <https://ht.usembassy.gov/security-alert-u-s-embassy-port-au-prince-haiti-november-11-2024/>; U.S. Department of State, *Haiti Travel Advisory* (Sep. 18, 2024), <https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories/haiti-travel-advisory.html>; U.S. Embassy in Haiti, *Security Alert – Port-au-Prince* (Jul. 31, 2024), <https://ht.usembassy.gov/security-alert-port-au-prince-31-july-2024/>. See also U.S. Department of Homeland Security (DHS), *Secretary Mayorkas Announces Extension and Redesignation of Haiti for Temporary Protected Status* (Jun. 28, 2024), <https://www.dhs.gov/news/2024/06/28/secretary-mayorkas-announces-extension-and-redesignation-haiti-temporary-protected> (the U.S. government extended and redesignated Temporary Protected Status – a for Haitians in June “because conditions that support Haiti’s designation are ongoing,” thereby recognizing that conditions in Haiti make it impossible to deport persons to the country safely).

⁴⁹⁸ David Culver & Abel Alvarado, *US to evacuate 20 embassy staff from Haiti following car attack and intensifying gang violence, say sources*, CNN (Oct. 24, 2024), <https://www.cnn.com/2024/10/24/americas/haiti-gang-violence-us-embassy-un-helicopter-intl-latam/index.html>.

⁴⁹⁹ Jacqueline Charles, *Gang violence shutdown Haiti’s main airport. That hasn’t stopped U.S. deportation flights*, Miami Herald (Dec. 4, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article296504994.html>.

⁵⁰⁰ Charles, *Gang violence shutdown Haiti’s main airport. That hasn’t stopped U.S. deportation flights* (Dec. 4, 2024); Charles & Ortiz Blanes, *U.S. deportation flight lands in Haiti amid spreading violence, attack on Catholic nuns* (Nov. 1, 2024); Ortiz Blanes & Charles, *DHS resumes Haiti deportations to gang-ridden Port-au-Prince* (Oct. 8, 2024). See also, e.g., @thcartwright, X (Dec. 3, 2024), <https://x.com/thcartwright/status/1863957099245346962> (a deportation flight departed Miami for Cap-Haïtien on December 3); @NathalyeCo, X (Oct. 31, 2024), <https://x.com/NathalyeCo/status/1852066070372454753> (“Just last week, the @USEmbassyHaiti condemned the ongoing gang violence in Port-au-Prince aimed at destabilizing the government. Yet today, it sent a flight through Jamaica, returning Haitians to a country where escalating criminal violence puts their lives at serious risk”); @thcartwright, X (Sep. 26, 2024), <https://x.com/thcartwright/status/1839373332677882263?s=46> (a deportation flight from Louisiana landed in Cap-Haïtien on September 26 after being rerouted through Jamaica for unknown reasons); U.S. Coast Guard, *Coast Guard repatriates 124 migrants to Haiti* (Sep. 19, 2024), <https://www.news.uscg.mil/Press-Releases/Article/3911051/>; @thcartwright, X (Sep. 6, 2024), <https://x.com/thcartwright/status/1832025648388251972> (a deportation flight departed Miami for Cap-Haïtien on September 6); Haiti Libre, *iciHaïti - Boat-People : 182 Haitian migrants intercepted and repatriated to Haiti* (Aug. 22, 2024), <https://www.haitilibre.com/en/news-43040-icihaiti-boat-people-182-haitian-migrants-intercepted-and-repatriated-to-haiti.html>; FlightAware, *GlobalX 6196* (Jul. 25, 2024), <https://www.flightaware.com/live/flight/GXA6196/history/20240725/1252Z/KMIA/MTCH> (a deportation flight departed Miami for Cap-Haïtien on July 25).

Rights groups are concerned that deportations may increase under President-elect Donald Trump, who has threatened to declare a national emergency in order to enact a mass deportation program. See, e.g., HBA, *Haitian Bridge Alliance strongly condemns plans to invoke national emergency to enable mass deportation* (Nov. 23, 2024), <https://haitianbridgealliance.org/haitian-bridge-alliance-strongly-condemns-plans-to-invoke-national-emergency-to-enable-mass-deportation/>.

⁵⁰¹ See International Refugee Assistance Project (IRAP), *A Violation of International and Humanitarian Principles: The United States Must Cease Deportation Flights to Haiti*, <https://refugeerights.org/news-resources/a-violation-of-international-and-humanitarian-principles-the-united-states-must-cease-deportation-flights-to-haiti> (last visited Dec. 8, 2024); HRW, *Rights Groups Oppose Recent Remarks Targeting the Haitian Immigrant Community* (Oct. 1, 2024).

⁵⁰² See Pooja Bhatia, *In the Twilight Zone*, The Baffler (Sep. 2024), <https://thebaffler.com/outbursts/in-the-twilight-zone-bhatia>.

⁵⁰³ The CHNV program permits lawful entry into the United States based on humanitarian need for up to 30,000 Haitian, Cuban, Nicaraguan, and Venezuelan beneficiaries per month (shared without allocation among the four nationalities). The program allows U.S.-based sponsors with legal status and adequate finances to apply online for Haitians outside of the United States. U.S. Citizenship and Immigration Services, *Processes for Cubans, Haitians, Nicaraguans, and Venezuelans*, <https://www.uscis.gov/CHNV> (last visited Dec. 8, 2024); U.S. Customs and Border Protection, *CBP Releases October 2024*

Monthly Update (Nov. 19, 2024), <https://www.cbp.gov/newsroom/national-media-release/cbp-releases-october-2024-monthly-update>.

⁵⁰⁴ Maria Sacchetti, *Biden administration won't renew parole for immigrations from four countries*, Washington Post (Oct. 4, 2024), <https://www.washingtonpost.com/immigration/2024/10/04/biden-migrants-parole/>; Syra Ortiz Blanes et al., *Feds won't renew humanitarian parole program for Venezuelans, Haitians, Cubans, and Nicaraguans*, Miami Herald (Oct. 4, 2024), <https://www.miamiherald.com/news/local/immigration/article293494409.html>; Haitian Times, *Haitians, Cubans, Venezuelans and Nicaraguans face deportation as U.S. ends humanitarian parole program* (Oct. 5, 2024), <https://haitiantimes.com/2024/10/05/haitians-cubans-venezuelans-and-nicaraguans-face-deportation-as-u-s-ends-humanitarian-parole-program/>.

⁵⁰⁵ Haitians complain that language, technology, and financial barriers put the CHVN program – which requires access to a passport, internet, a smartphone, and a U.S.-based sponsor – out of reach for many. Haitians who have previously attempted to claim asylum by crossing into U.S. territory outside of an official port of entry are barred from the program entirely. See IJDH, *Human Rights and the Rule of Law in Haiti: Key Recent Developments – June through November 2023* (Dec. 2023), note 437 and associated text; PAHO, *Public Health Situation Analysis – Haiti* (Oct. 4, 2024), p. 3 (“[L]egal emigration out of Haiti via humanitarian visas and programs is made extremely difficult by the complicated process of obtaining a passport which can take from months to a year.”).

⁵⁰⁶ Haiti Libre, *Haiti – Social : Increase in the number of illegal departure attempts by boat* (Jul. 21, 2024) (“For the vast majority of Haitians, regular migration is an extremely difficult path to even consider, or even undertake, leaving them to see irregular migration as their only option, a particularly dangerous option.”)

⁵⁰⁷ Bhatia, *In the Twilight Zone* (Sep. 2024) (“On June 4, Biden announced severe new restrictions on asylum seekers who cross between ports of entry. It’s not clear whether the rules will have the practical effect of ‘sealing the border,’ as dispiritingly advertised. They also contradict that pesky part of the INA [Immigration and Nationality Act] that allows aliens to apply for asylum.”); Patrick Saint-Pré, *Washington Issues New Immigration Policies, Issues Caution to Haitians*, Le Nouvelliste (Jun. 7, 2024), <https://www.lenouvelliste.com/en/article/248557/washington-issues-new-immigration-policies-issues-caution-to-haitians>. See also IJDH, *Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2023 through May 2024* (Jun. 2024), note 521 and associated text.

⁵⁰⁸ Following the Biden administration’s recent redesignation of Haiti for TPS, protection was extended until February 3, 2026 for Haitians already in the United States as of June 3, 2024. DHS, *Secretary Mayorkas Announces Extension and Redesignation of Haiti for Temporary Protected Status* (Jun. 28, 2024).

⁵⁰⁹ Miami Herald Editorial Board, *Trump’s vow to deport immigrants with protected status would hurt his home state the most*, Miami Herald (Nov. 15, 2024), <https://www.miamiherald.com/opinion/editorials/article295432269.html>.

⁵¹⁰ Haiti Libre, *Haiti – Social : Increase in the number of illegal departure attempts by boat* (Jul. 21, 2024); Sanon, *Haitian activists demand halt to deportations as gang violence and poverty soar* (Nov. 7, 2024) (many remain homeless because their neighborhoods are under the control of armed groups).

⁵¹¹ ACAPS, *Haiti: Humanitarian impact of increased deportations from the Dominican Republic* (Nov. 26, 2024), p. 1; Haiti Libre, *Haiti – Social : Increase in the number of illegal departure attempts by boat* (Jul. 21, 2024)

⁵¹² Duncan, *Stop ‘draconian’ mass deportations of Haitians fleeing gangs, activists say* (Nov. 14, 2024). See also ACAPS, *Haiti: Humanitarian impact of increased deportations from the Dominican Republic* (Nov. 26, 2024), p. 1 (“[M]any have no safe means of transport or safe destination within Haiti.”).

⁵¹³ OCHA, *Haiti – Advocacy note for the immediate mobilization of resources, August 2024* (Aug. 21, 2024), p. 8 (“[S]ince the beginning of the year, IOM has recorded more than 5,872 children deported to Haiti, and 33,624 children (44 per cent girls) at various border posts. Sixty-eight per cent of unaccompanied children identified by partners since January 2024 have been registered at border posts.”); Dánica Coto, *The number of children recruited by gangs in Haiti soars by 70%, UNICEF says*, AP News (Nov. 25, 2024), <https://apnews.com/article/haiti-gangs-child-recruitment-violence-ca5e78661185d36f3a94e774018a1dae>; ACAPS, *Haiti: Humanitarian impact of increased deportations from the Dominican Republic* (Nov. 26, 2024), p. 7 (“There are anecdotal reports that gangs are increasingly targeting deported men and boys returning to Artibonite and Ouest departments with no resources or livelihood options, leaving them with little choice but to join the gangs for access to resources”).

⁵¹⁴ @thcartwright, X (Sep. 6, 2024); @thcartwright, X (Sep. 26, 2024); FlightAware, *GlobalX 6196* (Jul. 25, 2024).

⁵¹⁵ Chéry, *At least 2 dead, 13 injured, and hundreds of homes flooded across Haiti after days of heavy rains expose lingering drainage failures* (Dec. 5, 2024); Ortiz Blanes & Charles, *DHS resumes Haiti deportations to gang-ridden Port-au-Prince* (Oct. 8, 2024). According to information shared by Michelle Karshan, Executive Director of Alternative Chance, a program that works with criminal deportees in Haiti, armed groups attack buses travelling along the sole route from Cap-Haïtien through the Central Plateau and the Artibonite Valley to Port-au-Prince, endangering Haitian returnees trying to reunite with their families.

⁵¹⁶ ACAPS, *Haiti: Humanitarian impact of increased deportations from the Dominican Republic* (Nov. 26, 2024), p. 7.

⁵¹⁷ According to information shared by Michelle Karshan, Executive Director of Alternative Chance, a program that works with criminal deportees in Haiti, police detain so-called criminal deportees arbitrarily, sometimes going one to two months without detaining any, then detaining all. Karshan also shared that hospitals sometimes refuse to treat criminal deportees, compounding their vulnerability.

⁵¹⁸ Chéry, *At least 2 dead, 13 injured, and hundreds of homes flooded across Haiti after days of heavy rains expose lingering drainage failures* (Dec. 5, 2024); ACAPS, *Haiti: Humanitarian impact of increased deportations from the Dominican Republic* (Nov. 26, 2024), pp. 1, 5-9 (“Humanitarian assistance and health, protection, and other basic services are limited or unavailable at the border crossings, leaving many needs unmet. . . . There is highly limited humanitarian support on the Haitian side of the

[Dominican] border, with few UN agencies, INGOs, and national NGOs present.”); Francisque, [Haitian migrants expelled from the Dominican Republic face dire conditions as committee struggles with lack of resources](#) (Oct. 24, 2024) (the lack of a migrant reception center in Ouanaminthe hampers efforts by Haitian authorities and humanitarian organizations to provide Haitians removed from the Dominican Republic with adequate food, water, medical care, and shelter); @IOMHaiti, X (Oct. 16, 2024), <https://x.com/IOMHaiti/status/1846632036108296475> (IOM was able to assist just 2,000 (approximately 14%) of the 14,000 Haitians deported from the Dominican Republic over two weeks in October, noting that “urgent funding is needed to reach more”).

⁵¹⁹ ACAPS, [Haiti: Humanitarian impact of increased deportations from the Dominican Republic](#) (Nov. 26, 2024), pp. 8-9 (“By October, the Protection of Migrants Working Group had received only 2% of its requested funding under the 2024 Humanitarian Response Plan. In 2023, underfunding meant that the working group was able to assist only 7% (around 15,000) of all 215,000 Haitian arrivals from the Dominican Republic.”). See also generally notes 574-77 and associated text.

⁵²⁰ The international community’s legacy of harmful interference in Haiti includes centuries of extractive and racist policies that have undermined Haiti’s development and sovereignty, such as France’s extortion of the Independence Debt; military occupation and interventions resulting in a myriad of grave harms; and persistent support for successive undemocratic and illegitimate regimes that have deliberately weakened Haiti’s government structures. See Concannon Jr., Fried & Filippova, [Restitution for Haiti, Reparations for All: Haiti’s Place in the Global Reparations Movement](#) (Dec. 13, 2023); Dominican Today, [Haiti joins CARICOM Reparations Commission](#) (Aug. 12, 2024), <https://dominantoday.com/dr/world/2024/08/12/haiti-joins-caricom-reparations-commission/>; RHI News, [Commémoration ce 28 juillet du triste anniversaire de la première occupation américaine d’Haïti de 1915...](#) (Jul. 28, 2024), <https://www.rhinews.com/actualites/commemoration-ce-28-juillet-du-triste-anniversaire-de-la-premiere-occupation-americaine-dhaiti-de-1915/>; Wilentz, [JD Vance’s Slanders Are Far From the Worst Thing the US Has Done to Haitians](#) (Sep. 11, 2024); Prosper et al., [Haiti’s Gang Violence Is a Symptom of Its Political Crisis](#), Jacobin (Aug. 14, 2024).

⁵²¹ See note 574.

⁵²² See notes 528-29.

⁵²³ IJDH, [Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2023 through May 2024](#) (Jun. 2024), p. 14; IJDH, [Human Rights and the Rule of Law in Haiti: Key Recent Developments – June through November 2023](#) (Dec. 2023), p. 12.

⁵²⁴ See notes 533-42 and associated text.

⁵²⁵ See notes 550-55 and associated text.

⁵²⁶ See notes 574-77 and associated text.

⁵²⁷ See notes 557-67 and associated text.

⁵²⁸ IJDH, [Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2023 through May 2024](#) (Jun. 2024), p. 14.

⁵²⁹ The two PHTK-affiliated members implicated are Smith Augustin (representing EDE/RED) and Louis Gerald Gilles (representing the December 21 Agreement). Emmanuel Vertilaire (representing *Petit Desalin*), who was included on the council thanks to pressure from CARICOM and the PHTK, is also implicated. See notes 190-73 and associated text; IJDH, [Human Rights and the Rule of Law in Haiti: Key Recent Developments – December 2023 through May 2024](#) (Jun. 2024), note 548 and associated text.

⁵³⁰ Statements regarding Haiti’s transition by international actors have avoided mentioning the corruption scandal at all, or have been soft on imperatives for specific accountability. See, e.g., CARICOM, [Statement by the Eminent Persons Group – following the visit to Haiti, 11-16 August 2024](#) (Aug. 20, 2024) (“[T]he corrosive impact of the allegations of corruption have contributed to the fragility of the transition process. The corruption allegations could not have come at a worse time, and will require speedy resolution in order to preserve the integrity of the institution and public confidence in the transition process. In this regard, the enquiry of the anti-corruption investigative agency will be of critical importance.”); U.S. Department of State, [Designation of a New Prime Minister in Haiti](#) (Nov. 12, 2024), <https://www.state.gov/designation-of-a-new-prime-minister-in-haiti/> (“It is also imperative to promote accountability within the TPC to maintain credibility with the Haitian people and the international community. The acute and immediate needs of the Haitian people mandate that the transitional government prioritize governance over the competing personal interests of political actors.”); UN, [Rising Displacement, Criminal Gangs and Corruption Continue to Plague Haitian Life, Slowing Democratic Reform, Speakers Tell Security Council](#) (Oct. 22, 2024), <https://press.un.org/en/2024/sc15859.doc.htm> (María Isabel Salvador, Special Representative of the Secretary-General and Head of BINUH, noted only that “on 7 October, Leslie Voltaire succeeded Edgard Leblanc as President of the Transitional Presidential Council, in a modified order of the pro-tempore presidency of the Transitional Presidential Council, amidst corruption allegations against three of its members”). See also Haiti Libre, [Haiti – Politic : International concerns over the political crisis in Haiti](#) (Nov. 16, 2024), <https://www.haitilibre.com/en/news-43647-haiti-politic-international-concerns-over-the-political-crisis-in-haiti.html> (“Georges Fauriol, an analyst at the Center for Strategic and International Studies (CSIS) in Washington, noted that the Biden administration had lost control of Haiti’s transition by allowing corruption problems within the CPT to persist without effective intervention.”). But see Jacqueline Charles, [Haiti welcomes new prime minister, Alix Didier Fils-Aimé, after council ousts Conille](#) (Nov. 12, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article295370414.html> (reporting that “[t]he Biden administration also seeks a resolution to ongoing corruption allegations involving three members of the council who are under criminal investigation over a bank bribery scandal and so far have refused to step down.”).

⁵³¹ UNSC, [Resolution 2699 \(2023\)](#), UN Doc. S/RES/2699 (2023) (Oct. 2, 2023), <https://digitallibrary.un.org/record/4022890?ln=en>.

⁵³² The deployed MSS force consists of 400 Kenyans (deployed June 25 and July 16), 24 Jamaicans (deployed September 12), two Belizeans (deployed September 12), and six Bahamians (deployed October 18). Arnold Junior Pierre, *Haiti PM Garry Conille vows to reclaim Haiti's capital from armed gangs as Kenyan forces arrive*, Haitian Times (Jun. 27, 2024), <https://haitiantimes.com/2024/06/27/soldat-kenyan-haiti-garry-conille/>; Francklyn B Geffrard, *Le Conseil de Sécurité de l'ONU se penche sur la crise en Haïti et discute du déploiement bientôt de la force multinationale...*, RHI News (Jun. 21, 2024), <https://www.rhinews.com/actualites/le-conseil-de-securite-de-lonu-se-penche-sur-la-crise-en-haiti-et-discute-du-deploiement-bientot-de-la-force-multinationale/>; Evens Sanon & Dánica Coto, *2nd UN-backed contingent of Kenyan police arrive in Haiti to help quell gang violence*, PBS News (Jul. 16, 2024), <https://www.pbs.org/newshour/world/2nd-un-backed-contingent-of-kenyan-police-arrive-in-haiti-to-help-quell-gang-violence>; Juhakenson Blaise, *Jamaican and Belizean forces arrive in Haiti to reinforce Kenya-led MSS*, Haitian Times (Sep. 13, 2024), <https://haitiantimes.com/2024/09/13/24-jamaican-and-two-belizean-officers-arrive-in-haiti/>; Haiti Libre, *Haiti – FLASH : A team of Bahamian soldiers has arrived in Haiti* (Oct. 19, 2024), <https://www.haitilibre.com/en/news-43446-haiti-flash-a-team-of-bahamian-soldiers-has-arrived-in-haiti.html>. See also Al Jazeera, *At least 150 people killed over past week in Haiti's Port-au-Prince: UN* (Nov. 2, 2024) (“[T]he MSS currently counts 416 ‘boots on the ground.’”).

A number of countries have pledged to send additional personnel but have yet to do so. Haiti Libre, *Haiti – Security : Panama plans to send a security contingent to Haiti* (Nov. 10, 2024), <https://www.haitilibre.com/en/news-43602-haiti-security-panama-plans-to-send-a-security-contingent-to-haiti.html> (Panama has pledged to send an unspecified number of officers); AlterPresse, *Mmas : Des troupes militaires du Salvador en Haïti* (Nov. 2, 2024), <https://www.alterpresse.org/spip.php?article31090> (El Salvador has promised to send troops, although the exact deployment date and size of the contingent are unknown); Jacqueline Charles, *'It's pure war.' A nation key to fight against Haiti's gangs puts deployment on hold*, Miami Herald (Sep. 13, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article292429649.html> (Benin's pledge of “the single-largest force of 1,500 to 2,000 soldiers, who also would be the only native French-speakers enlisted in the campaign” is on hold as of September over disagreements about the command structure and concerns about public perceptions in Benin); Frances Robles, *Leader of Kenya, Donor to Haiti Police Force, Makes First Visit*, NY Times (Sep. 21, 2024), <https://www.nytimes.com/2024/09/21/world/americas/kenya-haiti-ruto.html> (in September, Kenyan President William Ruto promised to send an additional 600 officers to Haiti over the course of October and November); Juhakenson Blaise, *Kenya-led security mission in Haiti extended as U.S. abandons plan to turn it into UN mission*, Haitian Times (Oct. 1, 2024), <https://haitiantimes.com/2024/10/01/mss-in-haiti-extended-for-one-year/> (Guatemala has pledged to deploy 150 soldiers and Guinea has promised 650, but “deployment dates and details remain unclear”).

⁵³³ Cf. Le-Cour-Grandmaison, *Haiti, caught between political paralysis and escalating violence* (Nov. 25, 2024) (attributing the security improvement between May and September to “an uncomfortable truce” between armed groups).

⁵³⁴ Michelson Césaire, *PNH: Bandits Eliminated and Areas Freed as Operations Persist to Reclaim Territories*, Le Nouvelliste (Sep. 2, 2024), <https://lenouvelliste.com/en/article/250005/pnh-bandits-eliminated-and-areas-freed-as-operations-persist-to-reclaim-territories>. See also UNSC, *Report of the UN Office on Drugs and Crime* (Oct. 16, 2024), ¶ 6 (“In June 2024, the Director General of the Haitian National Police presented a partial review of the joint police and Multinational Security Support mission contingent interventions and operations and announced that over 100 gang members had been stopped and another 65 arrested during recent operations.”).

⁵³⁵ See Luxama & Sanon, *Masses of Haitians flee homes in the capital as gang violence explodes amid political turmoil*, PBS (Nov. 14, 2024); Robles, *Haiti: 'It's Not Back to Where We Started – It's Worse'* (Nov. 13, 2024) (“Experts say the multinational security force’s failure to demonstrate big wins right away, like retaking gang-controlled neighborhoods, gave the gangs the confidence to re-emerge, after a brief retreat.”); Al Jazeera, *At least 150 people killed over past week in Haiti's Port-au-Prince: UN* (Nov. 2, 2024); Emiliano Rodríguez Mega, *Gang Gunfire in Haiti Hits U.S. Embassy Vehicles and U.N. Aid Helicopter*, NY Times (Oct. 25, 2024), <https://www.nytimes.com/2024/10/25/world/americas/haiti-gang-violence-us-embassy-un-helicopter.html>; Sam Bull, *US-Backed, Kenya-Manned Police Mission in Haiti is Struggling*, Responsible Statecraft (Oct. 17, 2024), <https://responsiblestatecraft.org/gangs-police-haiti/> (“Experts say the addition of 600 more officers [pledged by Kenya in the coming months] is unlikely to make a dent in the gang violence and instability.”); Frances Robles, *They Flew 7,000 Miles to Fight Haiti's Gangs. The Gangs Are on Top.*, NY Times (Oct. 9, 2024), <https://www.nytimes.com/2024/10/09/us/kenya-police-haiti-gangs.html>; Robles, *At Least 70 People Dead in Gang Attack in Haiti* (Oct. 4, 2024) (discussing the brutal massacre in Pont-Sondé, the UN Expert on Human Rights in Haiti explained that “[t]he leader of the Gran Grif gang knows that the multinational force lacks helicopters and the numbers necessary to take and hold areas”); Brad Dress, *US-backed mission in Haiti struggles to take on gang violence*, The Hill (Aug. 18, 2024), <https://thehill.com/policy/international/4831943-us-mission-haiti-gang-violence/>; RHI News, *Mission internationale en Haïti : la lutte contre les gangs armés s'enlise malgré le soutien du Kenya et des États-Unis*... (Aug. 19, 2024), <https://www.rhinews.com/actualites/mission-internationale-en-haiti-la-lutte-contre-les-gangs-armes-senlise-malgre-le-soutien-du-kenya-et-des-etats-unis/> (reporting that the MSS’s “only two major confrontations [with armed groups] to date have ended in setbacks”); Charles, *Kenyan commander denies Haiti police had to rescue his forces during joint operation*, Miami Herald (Aug. 14, 2024) (“Haitian officials have been increasingly critical of the Kenya security mission, citing a lack of equipment, from helicopters to armored vehicles, to the lack of personnel. In the weeks since the mission’s deployment began, armed gangs have not only taken control of Ganthier but are also close to taking over the cities of Fond-Parisien, Arcahaie and Gressier in the areas around the capital.”); Charles, *Gangs fled a Haitian town as Kenya force moved in. But only for a day* (Jul. 30, 2024) (the failed intervention in Ganthier highlights the inadequacies of the small, underfunded MSS mission, which lacks sufficient resources and a holding force to maintain security); Widlore Mérancourt & Amanda Coletta, *Kenyan police begin patrols, but Haiti's gangs are unperturbed*, Washington Post (Jul. 11, 2024), <https://www.washingtonpost.com/world/2024/07/11/haiti-kenya-un-security-mission/>.

⁵³⁶ The UN Trust Fund for the MSS has received just \$96.8 million. Even with the \$380 million pledged by the United States, the amount of funding falls far short of the \$600 million that Kenyan officials estimate the mission would need annually to sustain itself. UN, *Haiti : « La situation sur le terrain est très critique », prévient la Coordinatrice humanitaire* (Nov. 20, 2024), <https://news.un.org/fr/story/2024/11/1150746>; Wycliffe Muia, *Kenya's president makes urgent cash call for Haiti mission* (Oct. 11, 2024), <https://www.bbc.com/news/articles/c5y3xd1k5y3o>; Congressional Research Service, *Haiti in Crisis: What Role for a*

Multinational Security Support Mission, p. 2 (Oct. 2, 2024), <https://crsreports.congress.gov/product/pdf/IN/IN12331>; Haitian Times, *UN Security Council briefing highlights escalating crisis in Haiti amid calls for greater international support* (Oct. 23, 2024), <https://haitiantimes.com/2024/10/23/un-security-council-briefing-haiti-crisis/>; Jacqueline Charles, *Canada, UN step up calls for Haiti assistance as Jamaican security forces arrive to help*, Miami Herald (Sep. 13, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article292349409.html> (“The funding shortfall has led to a slow deployment of the 2,500 security personnel the mission is expected to have, and affected the effectiveness of the ill-equipped force.”); OHCHR, *Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns* (Sep. 20, 2024); BINUH, *Report of the Secretary-General* (Jun. 27, 2024), ¶ 69 (pledges “remain insufficient by a considerable margin,” and “[w]ithout substantial additional funding, the mission will be unable to complete a 12-month deployment”). See also <https://www.haitilibre.com/en/news-43404-haiti-politic-pm-conille-visits-kenyan-police-officers-from-the-next-contingent.html> (according to former interim Prime Minister Conille, “[t]he frustration is not only with the financing of the mission but also with the level of resources needed to support it,” which are “insignificant in comparison to other missions across the world”). The U.S. Department of State separately allocated \$109 million to the MSS in June, after U.S. funding was blocked for months by Republican lawmakers. Mohor, Jérôme & Kiage, *Haiti in-depth: Ten key questions as Kenyan police deploy to restore order* (Jun. 26, 2024).

⁵³⁷ Robles, *Leader of Kenya, Donor to Haiti Police Force, Makes First Visit* (Sep. 21, 2024) (Kenyan President William Ruto “acknowledged that the effort had been plagued by a shortage of equipment, tools and vehicles”); OHCHR, *Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns* (Sep. 20, 2024); Charles, *Canada, UN step up calls for Haiti assistance as Jamaican security forces arrive to help* (Sep. 13, 2024) (the MSS lacks air support and “has no maritime assets”); Charles, *What a gang attack in a rural Haiti town says about the Kenya-led security mission* (Jul. 26, 2024) (“The lack of helicopters, planes and boats is a significant constraint in the fight against gang violence, say security experts and area residents who note that the gangs are expanding their grip outside of Port-au-Prince.”).

⁵³⁸ The MSS “has so far deployed less than a quarter of its planned contingent” of 2,500, which in any case is nowhere near the 38,000 officers that the UN has stated Haiti would need, even with the 12,000 or so Haitian police officers still in the force. OHCHR, *Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns* (Sep. 20, 2024); Jacqueline Charles, *Where’s the money for Haiti? UN secretary presses for support as a key summit nears*, Miami Herald (Sep. 18, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article292674799.html>.

⁵³⁹ See Poincy, *Rethinking the International Response to Haiti’s Security Crisis*, Stimson (Jul. 23, 2024).

⁵⁴⁰ Widlore Mérancourt & Wethzer Piercin, *The Kenyan mission says it’s taken over the general hospital. The Haitian police refutes these claims*, Ayibo Post (Jul. 21, 2024), <https://ayibopost.com/the-kenyan-mission-says-its-taken-over-the-general-hospital-the-haitian-police-refutes-these-claims/>; Robles, *Leader of Kenya, Donor to Haiti Police Force, Makes First Visit* (Sep. 21, 2024) (“[T]he effort had been complicated by tensions between the overseas force and the Haiti National Police, and by a lack of coordination and equipment.”); Mérancourt & Coletta, *Kenyan police begin patrols, but Haiti’s gangs are unperturbed* (Jul. 11, 2024) (“Police officers say they haven’t been looped into a plan to restore order.”).

⁵⁴¹ Wethzer Piercin & Widlore Mérancourt, *Tensions rise between the Haitian Police and the Kenyan forces*, Ayibo Post (Sep. 5, 2024), <https://ayibopost.com/tensions-rise-between-the-haitian-police-and-the-kenyan-forces/> (PNH officers have “criticize[d] the Kenyans’ refusal to enter certain high-risk areas”). See also Charles, *More than 1,200 have been killed in Haiti as gangs launch fresh attacks. UN says* (Oct. 30, 2024) (describing MSS offensives against armed groups as “short lived”); Luxama & Sanon, *Masses of Haitians flee homes in the capital as gang violence explodes amid political turmoil*, PBS (Nov. 14, 2024) (a resident of Solino said he has not seen any MSS personnel in his neighborhood, which was attacked by armed groups in October); Phillips & Côté-Paluck, *‘This is effectively a civil war’: despair in Haiti as gangs step up assault on capital* (Oct. 30, 2024) (“[D]uring a week in Haiti’s capital, the Guardian saw no sign of that Kenya-led foreign force.”); Robles, *Leader of Kenya, Donor to Haiti Police Force, Makes First Visit* (Sep. 21, 2024) (“People who live in the capital say the Kenyan officers, who arrived in late June, are rarely seen — an impression confirmed by recent drives around the city in search of them.”); Charles, *Kenyan commander denies Haiti police had to rescue his forces during joint operation*, Miami Herald (Aug. 14, 2024) (“After the Kenya mission and Haitian police failed to secure Ganthier, residents state that the Kenyan forces did not fire back at the gangs and ultimately left Ganthier.”); Wethzer Piercin & Widlore Mérancourt, *What are Kenyans waiting for to act against bandits?*, Ayibo Post (Jul. 10, 2024), <https://ayibopost.com/what-are-kenyans-waiting-for-to-act-against-bandits/> (“Kenyan officers are undertaking reconnaissance missions with their Haitian counterparts, without engaging in combat.”).

⁵⁴² Piercin & Mérancourt, *Tensions rise between the Haitian Police and the Kenyan forces* (Sep. 5, 2024); Mohor, Jérôme & Kiage, *Haiti in-depth: Ten key questions as Kenyan police deploy to restore order* (Jun. 26, 2024). Despite earning much more than their Haitian counterparts, uncertainty about how much exactly and when MSS personnel would be paid are contributing to low morale. Edwin Okoth & Aaron Ross, *Shortages and delays hit morale of Kenyan officers in Haiti*, Reuters (Sep. 3, 2024), <https://www.reuters.com/world/americas/shortages-delays-hit-morale-kenyan-officers-haiti-2024-09-03/>; Le Nouvelliste, *Kenyan Police in Haiti Still Awaiting Full Salary Payment for Two Months*, CNN Reports (Aug. 26, 2024), <https://lenouvelliste.com/en/article/249896/kenyan-police-in-haiti-still-awaiting-full-salary-payment-for-two-months-cnn-reports>.

⁵⁴³ Piercin & Mérancourt, *Tensions rise between the Haitian Police and the Kenyan forces* (Sep. 5, 2024) (“Kenyans deployed to Haiti receive a monthly salary of \$1,490, seven times the average income of a Haitian police officer.”); Mohor, Jérôme & Kiage, *Haiti in-depth: Ten key questions as Kenyan police deploy to restore order* (Jun. 26, 2024) (“The fact that Kenyans don’t speak French will cause many collateral damages,” said Mario Joseph, managing attorney of the Bureau des Avocats Internationaux (BAI) in Port-au-Prince. “Will interpreters be in the line of fire? How will they proceed to help foreign officers understand Haitians?”); Poincy, *Rethinking the International Response to Haiti’s Security Crisis*, Stimson (Jul. 23, 2024) (on top of the pay disparity, MSS officers receive comprehensive benefits and “will benefit from guaranteed medical evacuation corridors to the Dominican Republic in the event of harm, in stark contrast to Haitian officers, who have no such assurances despite facing greater risks in the fight against criminal gangs”).

⁵⁴⁴ The MSS has formally adopted five policies aimed at guiding its conduct, though these do not appear to be posted on its website. Cf. Multinational Security Support Mission, *Mission multinationale de soutien à la sécurité en Haïti*, <https://www.mssmhaïti.com/fr> (last visited Dec. 5, 2024). The Compliance, Oversight and Accountability Policy (Apr. 2024), available at <https://drive.google.com/file/d/15eCHjhce6DPPmBCdVCY2rAWH4mIRtq11/view?usp=sharing>, inter alia, recognizes as one of its obligations “the establishment of a robust compliance mechanism to prevent, investigate, address, and publicly report human rights violations or abuses and an oversight mechanism to prevent human rights violations or abuses, in particular, sexual exploitation and abuse”; recognizes that the MSS “[a]s a primarily police, law enforcement operation is governed by international human rights law (IHRL), as applicable, and the domestic legislation of Haiti and Participating States”; commits to “establish a system for the identification of and processes for remedies for survivors and victims”; and promises the deployment of a Gender Advisor and a Civilian Oversight Advisory Committee. The Concept of Operations (Jun. 2024), available at https://drive.google.com/file/d/1YvuKy8-nm07InNCS5DsiO5_V8eC-afvU/view, inter alia, commits to implement a “robust compliance mechanism with concrete, systematic and mutually reinforcing measures and mechanisms to prevent, mitigate, and address international human rights law violations and is designed as a risk reduction framework to prevent civilian harm in the conduct of MSS operations” (Sec. 5.6.2), provides that “[f]emale officers should be represented throughout the chain of command in both junior and senior leadership positions” (2.4.5); and promises to “establish a common standard of conduct for its contributing countries; an accessible and secure complaint mechanism to receive reports of SEA in a confidential and safe manner and assist victims, and a mechanism for investigation of sexual misconduct allegations aligned with international human rights standards and a victim-centered approach” (5.9.3). The Conduct and Discipline Policy (Jun. 2024), available at https://drive.google.com/file/d/19sxa5KvmY_goM3e-GamzS5_P_BcXwhgY/view?usp=sharing, inter alia, commits to a “zero-tolerance policy” towards SEA and a well-publicized, “secure and accessible complaint and reporting mechanism”; and sets out a broad definition of serious misconduct that includes all instances of SEA. The Directive on Detention, Searches and Use of Force for Members of the MSS (Jun. 2024), available at https://drive.google.com/file/d/1JCXk2zf-hwLaaeYBzEa_00ByvApyH8X5/view, inter alia, requires all MSS personnel to “always exercise their functions in a manner that respects individual human rights, and . . . adhere to international criminal justice norms and standards, and other applicable international legal standards, including international policing standards,” to be “informed by” UN peacekeeping policies and subject to principles on the use of force, including “precaution, legality, necessity, proportionality, non-discrimination and accountability,” and establishing that violations of those standards, norms, and principles constitutes an act of serious misconduct for purposes of the MSS Conduct and Discipline Policy; and commits to ensure any detentions are executed in accordance with international human rights law. The Standing Operating Procedures Relating to the Complaints and reporting mechanisms of the MSS (MMAS) (Oct. 2024), available at https://drive.google.com/file/d/1vL.MXClaO2jR5lISBxfz8lJr_6mX6br/view?usp=sharing, sets out procedures to govern reporting and compliance mechanisms for serious violations and abuses. The MSS held a one-day consultation with civil society on October 18 where it solicited inputs on the envisioned mechanism and solicited civil society participation as focal points for survivor reporting. At the time of writing, the envisioned compliance mechanism had not been launched nor had the promised Civilian Oversight Advisory Committee been constituted.

⁵⁴⁵ While the five MSS policy documents contain some strong language, there is a serious question as to commitment and implementation, especially given the lack of a functioning reporting and compliance mechanism over five months into MSS deployment. Moreover, immunity for MSS personnel remains the default (the only meaningful sanction provided is repatriation of any offenders) and the documents do not seriously contemplate any compensation for potential victims, both issues that have materially undercut meaningful accountability for harms arising from past foreign interventions into Haiti. See generally, e.g., Sienna Merope-Syngé, *Emerging Voices: Seeking Child Support from UN Peacekeepers – A View from Haiti*, *Opinio Juris* (Aug. 16, 2019); IJDH, Opre Roma Kosovo & Harvard Law School’s International Human Rights Clinic, *Financing Reparations Owed to Victims of Serious Violations of Human Rights Law: Lessons from the United Nations’ Approach* (Mar. 2023), <https://www.ijdh.org/wp-content/uploads/2023/03/IHRC-IJDH-ORK-Financing-Reparations-Owed-to-Victims-of-Serious-Violations.pdf>; UNGA, *Report of the Special Rapporteur on the promotion of truth, justice, reparation and guarantees of non-recurrence*, Fabián Salvioli: *Financing of reparation for victims of serious violations of human rights and humanitarian law*, ¶ 60, UN Doc. A/78/181 (Jul. 14, 2023), <https://www.ohchr.org/en/documents/thematic-reports/a78181-report-special-rapporteur-promotion-truth-justice-reparation-and>. Further, the lack of an independent body responsible for investigating allegations and making disciplinary recommendations raises concerns about possible conflicts of interest, especially in the absence of a functioning civilian oversight body. Moreover, in spite of the requirements in the Compliance, Oversight and Accountability Policy, as of November 8 there was still no dedicated Gender Advisor and until recently, there had been no female mission personnel (a single woman deployed as part of the six-person Bahamian troop contribution), and we are not aware of any dedicated units or expertise for confronting the rampant GBV. See further AJWS, *Civil society organizations call on Biden administration to address human rights concerns about the international force in Haiti* (Aug. 21, 2024) (“The UN Security Council resolution that authorized the MSS contains clear and specific language calling for accountability mechanisms for the force. However, the Status of Forces agreement between Kenya and Haiti does not include these safeguards—in fact, though it mostly replicates the standard UN agreement for a peacekeeping force, it offers less oversight. It does not include a standard clause calling for a ‘standing claims commission,’ an independent body that would review any claims that members of the mission caused personal injury, illness or death.”); Poincy, *Rethinking the International Response to Haiti’s Security Crisis*, *Stimson* (Jul. 23, 2024) (“The SOFA signed by the Haitian and Kenyan authorities describes the privileges and immunities of MSS mission personnel, but there is no clear and independent framework for handling complaints of abuse. This omission reinforces the longstanding culture of impunity associated with previous peacekeeping missions in Haiti, such as MINUSTAH. Unlike MINUSTAH, however, the MSS is not a UN mission and is therefore not subject to internal UN procedures for processing complaints. As a result, Haitian citizens lack a legitimate mechanism to report potential abuses by MSS mission forces.”); Amnesty International, *Child Protection Urged as the Multinational Security Support Mission Deploys to Haiti* (Jul. 2, 2024), <https://www.amnestyusa.org/press-releases/child-protection-urged-as-the-multinational-security-support-mission-deploys-to-haiti-2/> (criticizing the lack of “transparent information regarding whether or how it [the MSS] has implemented human rights safeguards”); Mohor, Jérôme & Kiage, *Haiti in-depth: Ten key questions as Kenyan police deploy to restore order* (Jun. 26, 2024) (the limited safeguards in the agreement signed between Kenya and Haiti may not apply to MSS personnel from other countries, who are not obligated to sign the agreement, and “[h]uman rights activists have warned that neither the safeguards

needed to prevent and address potential abuses, nor the structure to assist and compensate victims, seem to exist.”); Amnesty International, [Haiti: Oral statement: Item 10: Interactive dialogue with the High Commissioner on interim report on Haiti, with the participation of the human rights expert on Haiti](#) (Oct. 8, 2024) (expressing “serious concerns about the mandate and structure of the recently deployed Security Support Mission authorized by the UN Security Council, including in the absence of clear human rights safeguard mechanisms”); Piercin & Norestyl, [Concern over police impunity in Haiti ahead of multinational intervention](#) (Jun. 10, 2024).

⁵⁴⁶ Winn FM, [Bahamas soldiers deployed to Haiti](#) (Oct. 21, 2024), <https://www.winnmediaskn.com/bahamas-soldiers-deployed-to-haiti/>.

⁵⁴⁷ BINUH is part of an effort to strengthen coordination between the MSS and the UN, and in September it signed the Human Rights Due Diligence Policy on United Nations support to non-United Nations Security Forces, indicating some level of expected support to the MSS. BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶¶ 25, 55.

BINUH’s mandate was renewed again until July 15, 2025, even as widespread insecurity and related logistical and staffing challenges continue to impact its capacity to fulfil its mandate. UNSC, [Resolution 2743 \(2024\)](#), UN Doc. S/RES/2743 (2024) (Jul. 12, 2024),

[https://undocs.org/Home/Mobile?FinalSymbol=S%2FRES%2F2743\(2024\)&Language=E&DeviceType=Desktop&LangRequested=False](https://undocs.org/Home/Mobile?FinalSymbol=S%2FRES%2F2743(2024)&Language=E&DeviceType=Desktop&LangRequested=False); BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶¶ 66-69.

⁵⁴⁸ UN HRC, [Interim report of the United Nations High Commissioner for Human Rights](#) (Sep. 26, 2024), ¶ 44; BINUH, [Report of the Secretary-General](#) (Oct. 15, 2024), ¶ 55 (“Awareness-raising sessions were developed for mission personnel on policies related to oversight and accountability and use of force principles. Strategic engagement was carried out with the leadership of the Multinational Security Support mission on a mechanism to receive and respond effectively to complaints on potential human rights violations that may come from Haitian individuals and civil society organizations.”).

⁵⁴⁹ Dánica Coto & Evens Sanon, [UN-backed contingent of foreign police arrives in Haiti as Kenya-le force prepares to face gangs](#), AP News (Jun. 25, 2024), <https://apnews.com/article/haiti-kenya-police-gangs-0e2c869427a5f7ff564355c5b10d6d5b> (“Rights groups and others have questioned the use Kenyan police, pointing out the years of allegations against officers of abuses, including extrajudicial killings. On Tuesday [around June 25], police again were accused of opening fire in the Kenyan capital of Nairobi, where thousands of protesters stormed the parliament.”); Mohor, Jérôme & Kiage, [Haiti in-depth: Ten key questions as Kenyan police deploy to restore order](#) (Jun. 26, 2024) (“‘Kenyan police officers are known to abuse the rights of people and get away with that,’ said Evans Ogada, one of the lawyers involved in trying to block the Kenyan deployment. ‘We do not expect anything different [in Haiti].’”). Private security contractor Studebaker Defense Group is also allegedly participating directly in police operations, “raising questions about rules of engagement and accountability for abuses.” Jake Johnston, [Haitian Government Hires US Security Contractor, but Questions Remain](#), Center for Economy and Policy Research (Oct. 30, 2024), <https://cepr.net/haitian-government-hires-us-security-contractor-but-questions-remain/>.

⁵⁵⁰ On August 1, 2023, U.S. Ambassador to the UN Linda Thomas-Greenfield acknowledged that the Kenya-led force being contemplated was “unusual” but said that, “what is happening in Haiti is unusual. This is not a traditional peacekeeping force. This is not a traditional security situation.” Her remarks were echoed by the UN Secretary-General in his written report to the UN Security Council two weeks later, where he emphasized that “[t]he current context in Haiti is not conducive to peacekeeping.” U.S. Mission to the UN, [Remarks by Ambassador Thomas-Greenfield at a Press Conference on the August Planned Program of Work and the U.S. Presidency of the UN Security Council](#) (Aug. 1, 2024), <https://usun.usmission.gov/remarks-by-ambassador-thomas-greenfield-at-a-press-conference-on-the-august-planned-program-of-work-and-the-u-s-presidency-of-the-un-security-council/>; UNSC, [Letter dated 14 August 2023 from the Secretary-General addressed to the President of the Security Council](#), UN Doc. S/2023/596 (Aug. 15, 2024), <https://www.securitycouncilreport.org/atf/cf/%7B65BF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/S-2023-596.pdf>.

⁵⁵¹ A UN peacekeeping mission would in theory come with guaranteed funding because UN peacekeeping missions are funded through assessed contributions from Member States, unlike the MSS, which as authorized relies on voluntary contributions. @USAmbOAS, X (Nov. 13, 2024), <https://x.com/USAmbOAS/status/1856787927042494699> (the United States joined the Organization of American States as co-sponsors of a November 13 resolution supporting a UN peacekeeping operation); Charles, [Where’s the money for Haiti? UN secretary presses for support as a key summit nears](#) (Sep. 18, 2024); Haitian Times, [UN Security Council briefing highlights escalating crisis in Haiti amid calls for greater international support](#) (Oct. 23, 2024); Widlore Mérancourt, [Details on the meetings between Blinken and the authorities in Haiti](#), Ayibo Post (Sep. 7, 2024), <https://ayibopost.com/details-on-the-meetings-between-blinken-and-the-authorities-in-haiti/>; Jacqueline Charles & Michael Wilner, [Exclusive: U.S. seeks to turn Kenya mission in Haiti into U.N. peacekeeping operation](#), Miami Herald (Sep. 4, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article291905150.html>.

⁵⁵² UNSC, [Resolution 2751 \(2024\)](#), UN Doc. S/RES/2751 (2024) (Sep. 30, 2024), <https://digitallibrary.un.org/record/4062838?ln=en&v=pdf>. See also Jacqueline Charles & Michael Wilner, [UN Security Council unanimously extends Kenya-led security mission in Haiti for a year](#), Miami Herald (Sep. 30, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article293246554.html> (the renewal “doesn’t address a fundamental problem of the struggling effort: money”).

⁵⁵³ Russia and China have been consistently opposed to transforming the MSS into a peacekeeping mission on the grounds that “the conditions on the ground in Haiti are not appropriate for U.N. peacekeepers” and in view of the less-than-satisfactory outcomes of previous UN peacekeeping missions. Edith M. Lederer, [Russia and China oppose changing the Kenya-led force in Haiti to a UN peacekeeping mission](#), AP News (Nov. 20, 2024), <https://apnews.com/article/un-haiti-gangs-kenya-force-peacekeeping-violence-d9ebd4a6a809d080511009b39b1b1ac>; Charles & Wilner, [UN Security Council unanimously extends Kenya-led security mission in Haiti for a year](#) (Sep. 30, 2024).

⁵⁵⁴ UN, [Clear Mandates, Better Resources Needed for Peacekeeping to Succeed in Increasingly Volatile World, Fourth Committee Hears](#) (Oct. 31, 2024), <https://press.un.org/en/2023/gaspd792.doc.htm>; International Peace Institute, [Financing UN](#)

Peacekeeping: Avoiding another Crisis (Apr. 2019), https://www.ipinst.org/wp-content/uploads/2019/04/1904_Financing-UN-Peacekeeping.pdf.

⁵⁵⁵ Congressional Research Service, *United Nations Issues: U.S. Funding of U.N. Peacekeeping* (Apr. 9, 2024), <https://sgp.fas.org/crs/row/IF10597.pdf>.

⁵⁵⁶ Blaise, *Kenya-led security mission in Haiti extended as U.S. abandons plan to turn it into UN mission* (Oct. 1, 2024); Beatrice Lindstrom, *A New Un-Sanctioned Force is Heading to Haiti. Will it Embrace Accountability?*, Harvard Law School International Human Rights Clinic (Oct. 23, 2023), <https://humanrightsclinic.law.harvard.edu/a-new-un-sanctioned-force-is-heading-to-haiti-will-it-embrace-accountability/>.

⁵⁵⁷ UNSC, *Resolution 2700 (2023)*, UN Doc. S/RES/2700 (2023) (Oct. 19, 2023), <https://digitalibrary.un.org/record/4024715?ln=en&v=pdf>; UNSC, *Resolution 2653 (2022)*, UN Doc. S/RES/2653 (2023) (Oct. 21, 2023), https://www.securitycouncilreport.org/atf/cf/%7B65BF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/s_res_2653.pdf.

⁵⁵⁸ OHCHR, *Haiti: Insecurity having dramatic human rights and humanitarian impact, UN expert warns* (Sep. 20, 2024); Prosper et al., *Haiti's Gang Violence Is a Symptom of Its Political Crisis*, Jacobin (Aug. 14, 2024); UN HRC, *Interim report of the United Nations High Commissioner for Human Rights* (Sep. 26, 2024), ¶ 47 (armed groups exploit “poorly monitored airspaces, unpatrolled coastlines and porous borders. . . . to obtain high-calibre weapons, drones, boats and a seemingly endless supply of bullets”). For more information, see generally UNSC, *Report of the UN Office on Drugs and Crime* (Oct. 16, 2024); GAO, *Caribbean Firearms: Agencies Have Anti-Trafficking Efforts in Place, But State Could Better Assess Activities* (Oct. 2024).

⁵⁵⁹ GAO, *Caribbean Firearms: Agencies Have Anti-Trafficking Efforts in Place, But State Could Better Assess Activities* (Oct. 2024), p. 13. See also Jacqueline Charles & Jay Weaver, *Report: Majority of trafficked guns in Caribbean are from the U.S., shipped from Florida*, Miami Herald (Nov. 17, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article295566749.html>; Wilner & Charles, *Top Democrats ask Biden for resources against arms trafficking from Florida to Haiti* (Sep. 26, 2024) (“Florida’s seaports have served as a huge pipeline for the illegal firearms and ammunition flowing into Haiti and ending up in the hands of armed gangs now controlling more than 85% of the capital.”); *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 54 (“The Panel has been investigating multiple cases of trafficking from the United States, the Dominican Republic and South America, with the United States remaining the main source of illicit arms and ammunition in Haiti.”).

⁵⁶⁰ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶¶ 55-60 (noting also that while trafficking by air from the United States is rare, “[t]he presence of multiple informal or clandestine airstrips in Haiti presents a real opportunity for traffickers, and. . . . the limited aerial surveillance and capability of the Haitian security agencies prevents effective monitoring of the situation by the authorities”).

⁵⁶¹ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶¶ 65-66 (97.8% of arms trafficked into Haiti via the Dominican Republic come from the United States, with most already circulating illegally in the Dominican Republic); GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 2* (Nov. 2024), p. 7; Francisque, *Daily gunfire plagues Ouanaminthe as stray bullets hit residents inside their homes* (Nov. 11, 2024).

⁵⁶² Quixote Center, *Summary of weapons trafficking legislation* (Jun. 2024), <https://quixote.org/summary-of-weapons-trafficking-legislation> (the Americas Regional Monitoring of Arms Sales Act, the Caribbean Arms Trafficking Causes Harm Act, the Stop Arming Cartels Act, and the Haiti Criminal Collusion Transparency Act); UNSC, *Report of the UN Office on Drugs and Crime* (Oct. 16, 2024), ¶ 17.

⁵⁶³ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 62 (“[A]lthough increased resource-intensive searches are being applied for containers or break-bulk vessels travelling from South Florida to Haiti, very few seizures were made between June 2023 and July 2024. . . . The vast majority of the 200 containers heading from South Florida to Haiti every week are not inspected.”); *Letter to Secretary Antony Blinken, Secretary Alejandro Mayorkas, Secretary Gina Raimondo, and Attorney General Merrick Garland from Members of Congress* (Sep. 26, 2024), p. 3.

⁵⁶⁴ GAO, *Caribbean Firearms: Agencies Have Anti-Trafficking Efforts in Place, But State Could Better Assess Activities* (Oct. 2024), p. 18 (citing language and logistical barriers); *Letter to Secretary Antony Blinken, Secretary Alejandro Mayorkas, Secretary Gina Raimondo, and Attorney General Merrick Garland from Members of Congress* (Sep. 26, 2024), pp. 4-5 (as a result, only a fraction of weapons recovered in Haiti have been traced).

⁵⁶⁵ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 63 (“Since January, the Panel has issued 49 tracing requests to the United States authorities for details on firearms seized either from gang members or at ports of entry in Haiti for it to have a greater understanding of the chains of custody and identify the trafficking networks involved. At the time of writing, responses were still pending. In July, the Panel also submitted a request to the United States Bureau of Alcohol, Tobacco, Firearms and Explosives under the Freedom of Information Act to obtain data about traces of firearms recovered in Haiti. The request was not granted.”).

⁵⁶⁶ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), at 17, ¶ 63 (Haitian authorities made five seizures of weapons and ammunition in the last year); UNSC, *Report of the UN Office on Drugs and Crime* (Oct. 16, 2024), ¶¶ 16, 18-20.

⁵⁶⁷ *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶ 64; GAO, *Caribbean Firearms: Agencies Have Anti-Trafficking Efforts in Place, But State Could Better Assess Activities* (Oct. 2024), p. 18.

⁵⁶⁸ See note 168.

⁵⁶⁹ Since IJDH’s last Update, the U.S. government announced sanctions on former President Michel Martelly, former deputy Prophan Victor, and *Gram Grif* leader Elan Luckson. U.S. Department of the Treasury, *Treasury Sanctions Former Haitian*

President for Drug Trafficking (Aug. 20, 2024), <https://home.treasury.gov/news/press-releases/jy2542> (Martelly was sanctioned for “abus[ing] his influence to facilitate the trafficking of dangerous drugs, including cocaine, destined for the United States. . . . engag[ing] in the laundering of illicit drug proceeds, work[ing] with Haitian drug traffickers, and sponsor[ing] multiple Haiti-based gangs”); U.S. Department of the Treasury, *Treasury Sanctions Former Haitian Politician and Gang Leader for Their Connections to Serious Human Rights Abuse* (Sep. 25, 2024), <https://home.treasury.gov/news/press-releases/jy2612> (Luckson was sanctioned for committing serious human rights abuses as the current head of the *Gran Grif* armed group; Victor was sanctioned for providing material support to the *Gran Grif* and other armed groups). The Canadian government announced sanctions against Luckson and two other armed group members. Government of Canada, *Canada imposes sanctions against Haitian gang leaders* (Jun. 21, 2024), <https://www.canada.ca/en/global-affairs/news/2024/06/canada-imposes-sanctions-against-haitian-gang-leaders.html>. The UN Security Council renewed its sanctions regime for an additional year, and added Victor and Luckson to the list of designated individuals. UNSC, *Resolution 2752 (2024)*, UN Doc. S/RES/2752 (2024) (Oct. 18, 2024), <https://www.un.org/en/media/accréditation/pdf/SCRes1.pdf>; <https://press.un.org/en/2024/sc15837.doc.htm>. See also IJDH, *Foreign Sanctions Against Haitian Individuals (December 2020 – Present)* (last visited Dec. 4, 2024) (tracking foreign sanctions against Haitian individuals for, among other abuses, corruption, arms trafficking, protecting and enabling illegal activities of armed criminal groups, and gross and systemic human rights violations). At least 25 of those sanctioned are affiliated with Haiti’s PHTK party. IJDH, *Sanctioned Haitian individuals associated with the Pati Ayisyen Tèt Kale (PHTK)*, https://docs.google.com/document/d/1j_q95vvgilAiW4nZ28-ftjwvjSi3iYc0gRhdaSAWmgo/edit?tab=t.0#heading=h.kclf4qy0io03 (last visited Dec. 9, 2024) (tracking foreign sanctions against high-ranking government officials and associates affiliated with Haiti’s PHTK party).

⁵⁷⁰ Despite numerous sanctions against them, armed group leaders Elan Luckson, Johnson “Izo” André, Renel “Ti Lapli” Destina, Jimmy “Barbeque” Chérizier, and Vitelhomme Innocent continue to kill and maim with impunity. Luckson and his *Gran Grif* armed group were responsible for the brutal massacre in Pont-Sondé in October. *Final report of the Panel of Experts on Haiti* (Sep. 30, 2024), ¶¶ 27-28; GI-TOC, *Will the Artibonite massacre be a turning point in Haiti?* (Oct. 9, 2024). See also notes 166-85.

⁵⁷¹ Jacqueline Charles, *U.S. ‘deeply disappointed’ by UN Security Council failure to sanction top Haitian politician*, Miami Herald (Jul. 12, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article290002404.html> (U.S. ambassador to the UN Linda Thomas-Greenfield criticized the UN for only sanctioning armed group leaders, who are not impacted by sanctions because they “usually do not keep their money in banks and do not have visas to travel to other countries”); also GI-TOC, *Observatory of Violence and Resilience in Haiti: Issue 1* (Jul. 2024), p. 2 (criticizing the EU for failing to designate any individuals under the sanctions regime it created in 2023, and noting the reluctance of the UN Security Council to designate the individuals backing armed groups “most likely because of the risk that designations on elites could negatively impact peacebuilding and government formation, though this comes with the equally palpable risk of allowing the elite-gang nexus to operate unhindered”). See also Roberson Alphonse, *USA, France, and Russia Urge Security Council to Impose Sanctions on Haitian Actors*, Le Nouvelliste (Jul. 3, 2024), <https://www.lenouvelliste.com/en/article/248945/usa-france-and-russia-urge-security-council-to-impose-sanctions-on-haitian-actors> (“The Russian Ambassador to the Security Council pointed out the reluctance to use sanctions to address the problem of illegal arms in Haiti.”).

⁵⁷² Jacqueline Charles, Jay Weaver & Michael Wilner, *U.S. sanctions Haiti’s former president, Michel Martelly, over role in drug trade*, Miami Herald (Aug. 21, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article291211995.html> (the U.S. reluctance to sanction Martelly “has made others reluctant to follow suit and fueled doubts in Haiti about how serious the policy [shift] is”).

⁵⁷³ Rafael Bernal, *Biden administration shines spotlight on Haiti’s shaky transition*, The Hill (Sep. 5, 2024), <https://thehill.com/latino/4864939-biden-blinken-haiti-gangs/> (because “Martelly is still believed to play an important leadership role in the PHTK and related groups, including parties represented directly in the transitional council,” IJDH Executive Director Brian Concannon believes the U.S. government was not trying to punish Martelly, but “nudge him to do something that they wanted him to do”); Tim Padgett, *The U.S. finally sanctions former president Michel Martelly – but Haitians want more*, WLRN (Aug. 20, 2024), <https://www.wlrn.org/americas/2024-08-20/michel-martelly-haiti-sanctions-drugs>.

⁵⁷⁴ OCHA, *Global Humanitarian Overview 2024, Mid-Year Update* (May 31, 2024), p. 10.

⁵⁷⁵ OCHA Financial Tracking Service, *Haiti 2024*, <https://fts.unocha.org/countries/96/summary/2024> (last visited Dec. 9, 2024).

⁵⁷⁶ Education Cannot Wait, *Education Cannot Wait, UNICEF, WFP and Strategic Partners Announce US\$2.5 Million ECW First Emergency Response Grant During High-Level Mission to Haiti with Total ECW Funding Topping US\$15.8 Million* (Jul. 26, 2024), <https://www.educationcannotwait.org/news-stories/press-releases/education-cannot-wait-unicef-and-strategic-partners-announce-us25> (as of July, “according to OCHA, the US\$30 million requirement for the education response as part of the country’s humanitarian response plan is only 27% funded”); UN News, *Haiti: Education in jeopardy as gang violence continues* (Sep. 11, 2024), <https://news.un.org/en/story/2024/09/1154186> (UNICEF is appealing for greater financial support, because as of September it has received only \$5.4 million of the over \$90 million it needs in order to carry out its activities in Haiti); UNFPA, *Situation Report #6: Haiti*, p. 4 (Aug. 19, 2024), https://www.unfpa.org/sites/default/files/resource-pdf/UNFPA%20Haiti%20Sitrep%20%236_REV.pdf (“UNFPA is appealing for US\$28 million to strengthen and expand access to life-saving SRH and GBV services and supplies in Haiti for women and girls in need in 2024. As of June 2024, UNFPA Haiti was able to mobilize and secure 19% of the required funding – a total of US\$5.4 million. However, a further US\$22.6 million (81%) of funding is still required to meet the urgent humanitarian needs in Haiti.”). Food programs are also particularly impacted. Sanon & Coto, *Hunger in Haiti reaches famine levels as gangs squeeze life out of the capital and beyond* (Oct. 1, 2024) (“[U.N. spokesman Stéphane] Dujarric said humanitarian food agencies and nonprofits in Haiti need an additional \$230 million until year’s end.”); WFP, *Hunger in Haiti reaches historic high with one-in-two Haitians now in acute hunger* (Sep. 30, 2024) (“Humanitarian food agencies and NGOs in Haiti are short of US\$ 230 million to implement programmes until the end of the year – while families displaced by this year’s surge in violence are on the frontline of rising hunger.”); IPC, *Haiti: IPC: Acute Food Insecurity Snapshot* (Aug. 2024-Jun. 2025) (“The situation is not expected to improve during the projected period (March to June 2025) as humanitarian food assistance is not expected to meet the needs of the population.”); OCHA, *Urgence Haïti*

Rapport de situation n° 29 (Du 8 au 20 juillet 2024) (Jul. 21, 2024), <https://reliefweb.int/report/haiti/urgence-haiti-rapport-de-situation-ndeg-29-du-8-au-20-juillet-2024> (“Emergency food assistance remains insufficient, covering less than four per cent of the total population from January to March 2024.”).

⁵⁷⁷ Frances Robles & David C. Adams, *In Haiti, a Grim Barometer: Even United Nations Workers Are Fleeing*, NY Times (Nov. 25, 2024), <https://www.nytimes.com/2024/11/25/world/americas/haiti-gang-violence-un-evacuations.html> (the surge in violence in November prompted a number of UN humanitarian offices to begin evacuating staff); Jacqueline Charles, *French President Macron decries firing of Haiti’s prime minister, calls decision ‘dumb’*, Miami Herald (Nov. 20, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article295848829.html> (UN humanitarian flights were grounded for 24 hours in November after armed groups attacked a World Food Programme helicopter and a number of commercial airplanes flying into Port-au-Prince); @IOMHaiti, X (Nov. 15, 2024), <https://x.com/IOMHaiti/status/1857425315980554344>; Le Nouvelliste, *UN Highlights the Struggles of Its Humanitarian Efforts in Haiti* (Nov. 13, 2024); Robles, *At Least 70 People Dead in Gang Attack in Haiti* (Oct. 4, 2024); WFP, *Hunger in Haiti reaches historic high with one-in-two Haitians now in acute hunger* (Sep. 30, 2024); Lederer, *Haitian gangs escalate violence and expand attacks outside the capital, top UN official says* (Oct. 22, 2024); UN News, *‘Entire social fabric’ unravelling in Haiti as displacement continues* (Jul. 20, 2024).

⁵⁷⁸ Wilentz, *JD Vance’s Slanders Are Far From the Worst Thing the US Has Done to Haitians* (Sep. 11, 2024) (“[M]any Haitians—and most foreign economic analysts—believe that much of this aid has gone to reinforce and enrich corrupt governments and their business friends, rather than to provide social programs and development for the population.”); Jacqueline Charles, *Haitian Americans sue Red Cross, accusing charity of mismanaging Haiti aid after quake*, Miami Herald (Nov. 25, 2024), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article296096674.html> (a new lawsuit against the Red Cross accuses the aid organization and related entities of “exploiting ‘the poverty and calamities’ of an impoverished Haiti to raise hundreds of millions of dollars in the name of humanitarian aid only to mismanage and misappropriate the funds to enrich themselves”). See generally Jake Johnston, *Aid State: Elite Panic, Disaster Capitalism, and the Battle to Control Haiti* (2024). See also Lauren Evans, *Is the aid sector still failing victims of sexual abuse*, Devex (Nov. 21, 2024), <https://www.devex.com/news/is-the-aid-sector-still-failing-victims-of-sexual-abuse-108795> (discussing sexual abuse by aid workers, including in Haiti).

