



# Honduras

JUDICIAL SYSTEM ASSESSMENT

SEPTEMBER 2024



CYRUS R. VANCE CENTER  
FOR INTERNATIONAL JUSTICE



FECAJUD  
Honduras

# Honduras

## Judicial System Assessment in Central America and the Caribbean

### Index

<b>Introduction</b> .....	<b>1</b>
1. Composition .....	2
2. Nomination, selection and appointment of magistrates and judges. ....	3
3. Concentration of financial and administrative powers and powers relating to the functioning of the judicial civil service. ....	5
4. Security of judicial operators .....	6
5. Corruption in the judicial system .....	7
6. Support and recognition of independent judicial operators .....	8
<b>Endnotes</b> .....	<b>9</b>

Last update: September 2024



# Introduction

This document is part of a series of diagnoses on the situation of the judiciary in Central American countries, which aim to provide concrete and updated information on the different countries in the region, make problems visible and generate productive dialogues with the national and international community.

The diagnosis summarizes the main normative aspects of the functioning of the Judiciary in Honduras, as well as the complications in terms of judicial independence in this jurisdiction. It also studies the progress that has been made through the adoption of norms and policies aimed at mitigating these complications.

It was produced by the Central American Federation of Judges for Democracy FECAJUD as part of a project to strengthen the independent judiciary with the *Cyrus R. Vance Center for International Justice* of the New York City Bar Association, with support from the National Endowment for Democracy (NED).

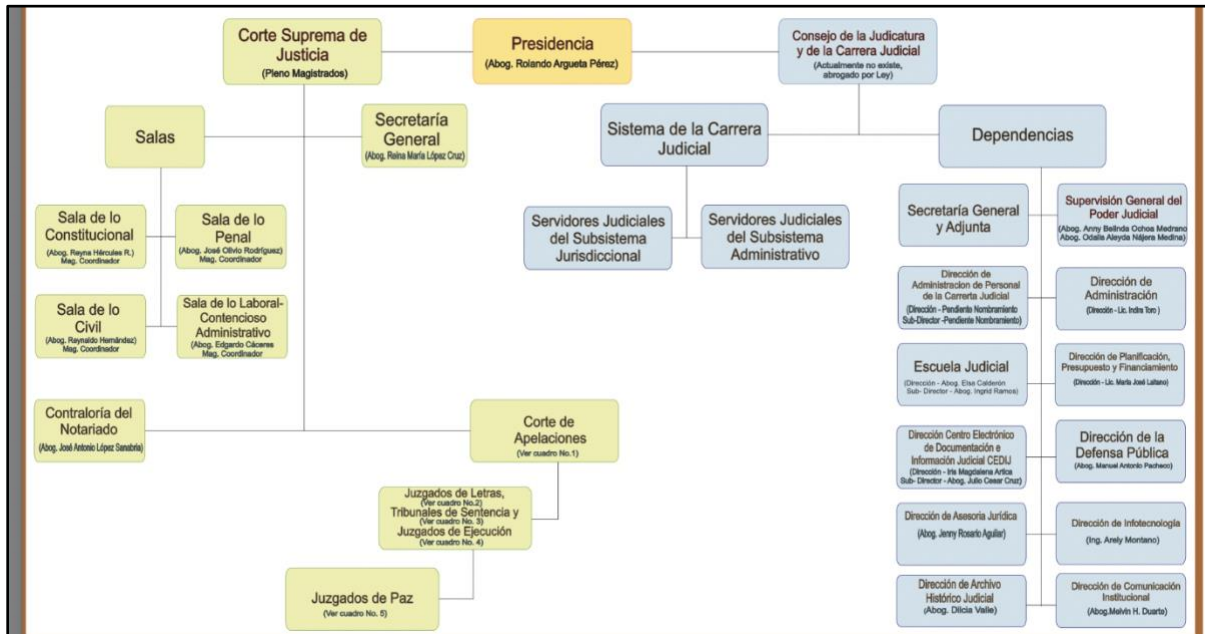
**FECAJUD** was established in the city of Tegucigalpa, Republic of Honduras on May 1, 2009

as a non-profit legal entity, under private law, made up of associations of Central American judges and magistrates with a democratic vocation committed to strengthening the Constitutional Rule of Law, Judicial Independence and respect for Human Rights. The Federation's goals are to contribute to the consolidation of the Democratic Rule of Law and Judicial Independence in the countries of Central America, and fundamentally to contribute to a greater awareness, on behalf of judges, as guarantors of Human Rights.

The *Cyrus R. Vance Center for International Justice* promotes global justice by engaging legal professionals around the world to support civil society and an ethically active legal profession. It is a non-profit program of the New York City Bar Association that brings together leading law firms and other partners around the world to promote international justice initiatives and provide pro bono legal representation to civil society organizations fighting for social justice.

# 1. Composition

The Judicial Branch in Honduras is composed of the Supreme Court of Justice, the Courts of Appeals, the Courts of Letters and the Peace Courts.<sup>1</sup>



Source: <https://www.poderjudicial.gob.hn/SiteAssets/Paginas/Organigrama/OrganigramaPJ-Mayo2020.pdf>

The Judicial Branch can then be divided into two subsystems:

1) Jurisdictional Subsystem, composed of:

- a) The Supreme Court of Justice as the governing body, which consists of four integrated chambers made up of a total of fifteen magistrates; a) Constitutional Chamber (5 Magistrates), Criminal Chamber (3 Magistrates), Civil Chamber (3 Magistrates) and Contentious-Administrative-Labor Chamber (3 Magistrates).
- b) The Courts of Appeals are divided by subject matter and in some cases by departments (territorial division), some specializing in Civil, Labor, Contentious-Administrative and Criminal matters and corruption (9 Courts of Appeals nationwide).

- c) The Courts of First Instance hear civil, labor, contentious-administrative, contentious-fiscal, child, domestic violence, criminal matters and Sentencing Courts, execution, corruption and deprivation of assets of illicit origin. At the national level, there are 66 Courts of First Instance distributed throughout the country, where there is at least one in each departmental capital where the main matters are heard, and other more specialized courts in the judicial sections with the highest concentration of population.
- d) The Peace Courts are distributed in the main municipalities of each department; there are around 325 Peace Courts nationwide.

2) The administrative body, known as the Council of the Judicial Civil service, which is also in charge of the administration of the different jurisdictional bodies at the labor, administrative and functional levels.



This administrative body always reports to the Supreme Court of Justice.

## 2. Nomination, selection and appointment of judges and magistrates

One of the recurring problems in different jurisdictions in Central America is the influence of other public authorities, political actors and the private sector in the nomination, election or designation and appointment of judges and magistrates, to pursue individual interests. There are also problems with the suitability of the profiles

that make up the judicial body and this affects the quality of decisions. Likewise, there is a problem of trust in the judiciary on the part of the citizens and all the actors of the legal community, as well as a series of defects and irregularities in the decisions made by these operators that result in a fracture of the rule of law.

### a) Appointment process subject to individual interests

Magistrates of the Supreme Court of Justice are appointed through the Nominating Board, which appoints 45 candidates that meet the requirements of law and are not contemplated in the respective disqualifications, so that, from this list, the National Congress of the Republic elects 15 magistrates requiring the favorable vote of two thirds of its deputies. Its conformation responds to the election made by the National Congress of the Republic, through its representatives, benches and number of votes reached. This process is contemplated in Article 311 of the Constitution.<sup>2</sup>

The constitutional provisions are complemented by those of the Organic Law of the Nominating Board for the Election of Candidates for Magistrates of the Supreme Court of Justice, as well as in the Law of the Public Prosecutor's Office in the case of prosecutors.

The Nominating Boards are composed of different legal actors from the legal community such as academics, judges, practicing lawyers, the National Commissioner for Human Rights, other representatives of universities and think tanks and members of civil society as provided for in Article 311 of the Constitution.

This normative design necessarily implies interference of the legislative branch in the formation of the high courts.

On the other hand, the Supreme Court of Justice appoints the magistrates of the Courts of Appeals and the Justices of Letters appoint the Justices of the Peace. Article 117 of the Constitution establishes the creation of a Council of the Judiciary and the issuance of a law regulating its functions, conformation and scope.<sup>3</sup> Decree 282-2010 of January 19, 2011 created the constitutional basis to allow these mechanisms, and provided for the transfer of administrative powers from the Supreme Court of Justice to the Council. However, Article 3 of this decree empowered the President of the Supreme Court to carry out the selection, appointment and dismissal of judges and administrative personnel until the Council is established.

Both the Council and the judicial civil service were established in 2011 by Decree 219-2011, which provided that the Council would then be the constitutional body of administration and management of the Judiciary, also attributing to it functional and administrative autonomy and independence, subject only to the Constitution and the law. However, in March 2016, the Constitutional



Chamber of the Supreme Court of Justice declared it unconstitutional as it considered that it contravened exclusive attributions of the Court.

The Constitutional Chamber of the Supreme Court of Justice then dissolved the Judiciary Council in 2016, which led to a return of the application of Article 3 of Decree 282-2010, which empowers the same President of the Court to appoint and dismiss judges and magistrates.<sup>4</sup> Therefore, the Judicial Civil service Law of 1980 and its Regulations of 1987 are currently still in force. It must be noted that this law was strongly criticized by the Inter-American Court of Human Rights in the judgment of the case *López Lone et al. v. the Republic of Honduras*, which indicated that the rights of judges were not guaranteed in the context of disciplinary proceedings that took place after the coup d'état of 2009.<sup>5</sup>

On this point, the United Nations Special Rapporteur on the Independence of Judges and Lawyers indicated that:

*"In López Lone et al. v. Honduras, the Inter-American Court of Human Rights found that there was 'a total lack of clarity' as to the applicable procedure and the authorities that should hear and resolve disciplinary proceedings against the victims. The Court also found that, as an auxiliary body of the Supreme Court, the Judicial Civil service Council*

*lacked due independence to review the Court's dismissal decisions. The findings of the Inter-American Court of Human Rights with respect to the disciplinary regime applicable to ordinary judges could be applied, mutatis mutandis, to disciplinary proceedings against Supreme Court justices. The Constitution does not contain any provision on the body in charge of handling disciplinary cases against Supreme Court justices nor on the procedure to that effect".<sup>6</sup>*

This regulatory framework undermines Judicial Independence as established in Article 303 of the Constitution, as well as the exclusive authority of the judiciary established in subsequent Article 304. Likewise, the institutional design for the appointment of high-ranking magistrates and prosecutors does not appear to be merit-based.

International norms and standards such as the pronouncements of the Inter-American Human Rights System regarding the independence and impartiality of the courts, including appointments, promotions, evaluations, among others, are also violated.<sup>7</sup> Principle 11 of the Basic Principles on the Independence of the Judiciary is also affected.

These problems affect not only the jurisdictional function but also the criminal investigation function. The Attorney General was appointed without competition.<sup>8</sup>

## **b) Illegal dismissals and transfers**

Article 307 of the Constitution states that:

*"The Law, without detriment to the independence of judges and magistrates, shall provide for what is necessary to ensure the correct and normal functioning of the jurisdictional bodies, providing the effective means to meet their functional and administrative needs, as well as the organization of auxiliary services."*

It also establishes that judges and magistrates may only be suspended, transferred or removed from office in accordance with the legal processes and the causes set forth in the same law.<sup>9</sup>

Considering this normative framework, we recall the havoc caused by the dismissals of magistrates who condemned the coup d'état in 2009. This process was the subject of the previously mentioned process before the Inter-American Court of Human Rights, which in 2015 concluded that the Supreme Court of Justice did not meet the standard of impartiality required for these processes and that the Judicial Civil service Council was not independent from this court to make the respective reviews.



Years later, in December 2012, the legislature dismissed magistrates José Antonio Gutiérrez Navas, Gustavo Enrique Bustillo Palma, José Francisco Ruiz Gaekel and Rosalinda Cruz Sequeira from the Constitutional Chamber of the Supreme Court of Justice due to a ruling declaring the unconstitutionality of Decree 89-2012 on the application of confidence tests to Honduran police officers.<sup>10</sup> On the same day, Congress swore in four new magistrates.<sup>11</sup>

In fact, the Inter-American Court ruled on the latter case in April 2024, condemning the State of Honduras for the arbitrary dismissal of the judges of the Constitutional Chamber. The Court concluded that:

*"Likewise, this Court has pointed out that one of the main objectives of the separation of public powers in a republican system is to guarantee the independence of judges and, to that end, the different political systems have devised strict procedures for both their appointment and removal. The mechanism for the selection and removal of judges must be consistent with the democratic political system as a whole. The co-optation of judicial bodies by other public powers affects the entire democratic institutionality transversally, and to that extent constitutes a risk for the control of political power and the guarantee of human rights, since it undermines the institutional guarantees that allow the control of the arbitrary exercise of power. In this sense, the Court considers that any detriment or regression in the guarantees of independence, stability and irremovability of judges is undesirable insofar as its effect may translate into an equally regressive systemic impact on the rule of law, institutional guarantees, and the exercise of fundamental rights in general. The protection of judicial independence acquires special relevance in the current global and regional context of the erosion of democracy, where formal powers are used to promote anti-democratic values, emptying institutions of their content, and leaving only their mere appearance."<sup>12</sup>*

In the ruling, the Court ordered a series of restitution and compensation measures for the affected judges, as well as measures of satisfaction as a public act of recognition by the authorities and measures to guarantee the non-repetition of these events.<sup>13</sup>

The various problems of judicial independence in this jurisdiction were documented in the preliminary observations and later in the Final Report on the official visit to Honduras of the United Nations Special Rapporteur on the independence of judges and lawyers, Diego García-Sayán.

*"The Special Rapporteur considers that this legal and institutional framework of the judiciary has serious gaps and is not sufficient, in its current form, to protect and promote the independence of the judiciary from the other branches of government (i.e. institutional independence) and the independence of judges to adjudicate cases brought before them impartially and autonomously (i.e. personal independence). Similar concerns have been expressed by other human rights mechanisms."<sup>14</sup>*

He notes, at the end of his report, that the Supreme Court of Justice established a commission with the task of drafting a new law to regulate the Judiciary Council and the administrative and financial affairs of the Judiciary.

17 cases of dismissals and transfers without grounds were reported in the last months of the year 2023. As a result of a dialogue between the Association of Judges and Magistrates of Honduras (ASOJMAH) and the Association of Employees of the Judiciary, on the one hand, and representatives of the Supreme Court of Justice on the other. In addition, following an *on-site* visit by the Inter-American Commission on Human Rights, a thematic hearing was held which resulted in a series of recommendations from the Commissioners to the State of Honduras. Judicial associations report new cases of transfers in 2024.

### 3. Concentration of financial, administrative and judicial powers.



At this time the Supreme Court of Justice has the power to perform the following financial and administrative tasks: 1) organize and direct the judicial branch, 2) appoint and remove the magistrates of the Courts of Appeals and Judges; 3) prepare the annual budget of the judicial branch and send it to the Congress of the Republic for its approval, 4) create, suppress, merge and transfer the courts, Courts of Appeals and other judicial dependencies (courts of letters and sentencing courts, Corruption, etc.).

As a result of the legal vacuum created by the declaration of the Law of the Judiciary Council and the Judicial Civil service (Decree 219-2011) as unconstitutional, a transitory decree of the Legislative Branch that concentrates financial and administrative powers in the President of the Supreme Court of Justice has been reestablished.

*"The dissolution of the Council of the Judiciary by decision of the Supreme Court has deprived the judiciary of an institution that should have been essential to safeguard judicial independence and has resulted in the transfer of administrative functions formerly exercised by the Council to the Supreme Court." <sup>15</sup>*

On February 16, 2024, the President of the Judicial Branch issued Official Communication 62-2024 modifying the order of precedence in the Chambers. This function corresponds to the plenary of magistrates of the Supreme Court of Justice and not to the person who presides the judicial body. This means that the person who was to assume the presidency of the Constitutional Chamber, by virtue of the law, was substituted by another. The Assistant Secretary for Western Hemisphere Affairs of the U.S. Department of State expressed concern, urging transparency and independence in this process. <sup>16</sup>

## 4. Security of judicial operators

Since 2015, thanks to the Law for the Protection of Human Rights Defenders, Journalists, Social Communicators and Justice Operators, there has been significant progress in the protection of all justice operators who are threatened by organized crime. Nonetheless, its operational capacity is still limited due to budgetary restrictions.

There are security protocols in place for those at the highest levels of the judiciary, such as Supreme Court justices and Court of Appeals judges, when it comes to sensitive matters; however, all judicial personnel may submit to and request security measures if necessary using the mechanism for the protection of judicial officials.

In addition, under the previously mentioned law, there is a special protection unit for judges, magistrates and public defenders that can also be used. It is important to note that this was not yet

operational at the time of the Special Rapporteur's visit.

There are still physical risks for judicial operators and lawyers in the country. In this regard, it should be noted that 125 lawyers have been murdered in the last 10 years, and that 97% of these crimes remain unpunished.<sup>17</sup>

Regarding legal security, the magistrates of the Courts of Appeals and of the Supreme Court of Justice enjoy immunity and will answer only to the National Congress for the official and common crimes they commit. The National Congress, hearing a prosecutor, if any, will present the case and declare whether there is cause for the formation of a case. In the first case, the proceedings will be passed to the Supreme Court to remove the respective immunity and then to the Congress of the Republic to determine whether to remove the immunity.





## A) Harassment of judicial operators through complaints

Cases have been reported of threats of transfers, and of administrative proceedings against persons

who impart justice and who represent judicial associations on account of their activities in defense of judicial independence.

## 5. Corruption in the judicial system

As mentioned above, problems in the composition of the judiciary result in a series of decisions that affect governance and the rule of law.

The undue interference of Congress in the operation of the judiciary is not only proven by the appointment of high court judges, but also became visible in a series of corruption cases under the analysis of the Supreme Court of Justice.<sup>18</sup> For example, in the case *Red de Diputados*, which related to crimes of embezzlement of public funds, through the Departmental Funds for social projects, by more than 100 officials including deputies of Congress. According to the facts, in 2018 Congress adopted amendments to the Organic Budget Law (Decree No. 141-2017) establishing an examination and report by the Superior Court of Accounts (TSC) as a requirement to initiate legal action in any case of embezzlement. A magistrate of the Supreme Court of Justice decided to file the criminal investigation and refer the case to the TSC on account of this law. The decision was appealed to the Supreme Court in 2018. It was only in 2022 that the case was reactivated.<sup>19</sup>

Another example is found in the *Pacto de Impunidad* case. Here, the modification of Decree 141-2017 was precisely studied, and it was exactly at the time of publication, that an erratum was included that had a different content from the one approved in plenary session of the legislative branch. The modifications implied this series of obstacles referenced above (evaluation of the TSC) in the investigation of officials who have administered public funds. It was precisely for this reason that the *Red de Diputados* case was justified. Individuals were charged with falsification of documents, abuse of authority, and crimes

against the form of government. Yet, the process has not moved forward.

Likewise, the irregularly appointed justices of the Supreme Court of Justice enabled the reelection of President Juan Orlando Hernandez in 2018 against an article of the Constitution that they left without effect to allow this figure.<sup>20</sup>

Within the operation of the same judiciary there are a series of irregularities that are evident, for example, in the arbitrary detention of defenders of the land and territory of the Guapinol River since 2019.<sup>21</sup> This fact was denounced by the United Nations Working Group on Arbitrary Detention. Recently, the Court ordered the release of six of them.<sup>22</sup> The Office of the United Nations High Commissioner for Human Rights (OHCHR) welcomed the ruling.

Finally, the National Anticorruption Commission warned about magistrates who try to benefit individuals denounced in corruption cases related to the scandal of the Honduran Social Security Institute.<sup>23</sup>

OHCHR and IACHR denounced delays in the investigation, prosecution, and clarification of the facts in the case of the murder of Berta Cáceres.

One aspect that could imply progress in the fight against corruption and impunity and support the work of the judiciary in the country, would be the installation of the International Commission Against Impunity (CICIH), with the support of the United Nations, which was announced by President Xiomara Castro.<sup>24</sup> Although there is no evidence of significant progress on this point<sup>25</sup>, different civil society



organizations continue to press for, and highlight the importance of, this mechanism.<sup>26</sup>

## 6. Support and recognition of independent judicial operators

It is worrisome that a very limited segment of the population has trust in the Judiciary.

The figures for organized crime are high and there is no evidence of a solution from a judicial point of view, due to the lack of judicial independence and undue interference of other public authorities, as well as from these armed groups. On this point, *Human Rights Watch* stated in 2021 that:

*"Judges are the target of acts of interference, such as political pressure, threats and harassment by the executive branch, private individuals with ties to the government and gangs. Prosecutors and whistleblowers have received death threats. The Supreme Court, particularly its president, exercises excessive control over the appointment and removal of judges, and the instability of the professional civil service limits the independence of judges."*<sup>27</sup>



## Endnotes

<sup>1</sup> *Report of the Special Rapporteur on the independence of judges and lawyers*, Visit to Honduras, Human Rights Council, A/HRC/44/47/Add.2, page 4 (June 15-July 3, 2020): <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G20/124/49/PDF/G2012449.pdf?OpenElement>

<sup>2</sup> *The Magistrates of the Supreme Court of Justice shall be elected by the National Congress, with the favorable vote of two thirds of the totality of its members, from a list of candidates of no less than three for each of the magistrates to be elected.*

*Once the proposal has been presented with all of the Magistrates, the election shall proceed.*

*In the event that a qualified majority is not reached for the election of the full slate of Judges, a direct and secret ballot shall be held to elect the missing Judges individually, as many times as necessary, until a two-thirds favorable vote is reached.*

*The Judges shall be elected from a slate of candidates proposed by a Nominating Board, which shall be composed as follows:*

1. *A representative of the Supreme Court of Justice elected by a two-thirds favorable vote of the Magistrates;*
2. *A representative of the Bar Association, elected in Assembly;*
3. *The National Commissioner for Human Rights;*
4. *A representative of the Honduran Council of Private Enterprise (COHEP), elected in Assembly;*
5. *A representative of the teaching staffs of the Schools of Legal Sciences, whose proposal shall be submitted to the Board of Directors.*

*will be carried out through the National Autonomous University of Honduras (UNAH);*

6. *One representative elected by civil society organizations; and,*

7. *A representative of the Workers' Confederations.*

*A law shall regulate the organization and operation of the Nominating Board.*

<sup>3</sup> **Article 317, Constitution** - ARTICLE 317.- *The Council of the Judiciary is hereby created, the members of which shall be appointed by the Supreme Court of Justice. The law shall establish its organization, scope and powers.*

*Judges and Magistrates may not be removed, suspended, transferred, demoted or retired, except for causes and with the guarantees provided by law.*

<sup>4</sup> *Rule of Law is Disintegrating in Central America*, José Miguel Vivanco, Human Rights Watch (October 25, 2021): <https://www.hrw.org/es/news/2021/10/25/se-esta-desintegrando-el-estado-de-derecho-en-centroamerica>

<sup>5</sup> *Inter-American Court of Human Rights, Judgment of October 5, 2015, Preliminary objection, merits, reparations and costs, Paragraph 264, "The Court considers that this regulatory design affected the foreseeability of the sanction because it allowed the removal of a judge for breach of any of the duties or incompatibilities of his or her position when the judge understood that it was a serious breach and thus granted excessive discretion to the body responsible for applying the sanction. This Court considers that a certain degree of indeterminacy does not generate, per se, a violation of the Convention, that is to say, the fact that a rule grants some type of discretion is not incompatible with the degree of foreseeability required, as long as the scope of the discretion and the manner in which it is to be exercised is indicated with sufficient clarity in order to provide adequate protection against arbitrary interference. Consequently, the Court considers that the disciplinary rules applicable to the cases of the alleged victims granted excessive discretion to the judge in establishing the sanction of dismissal":* [https://www.corteidh.or.cr/docs/casos/articulos/seriec\\_302\\_esp.pdf](https://www.corteidh.or.cr/docs/casos/articulos/seriec_302_esp.pdf).



<sup>6</sup> *Report of the Special Rapporteur on the independence of judges and lawyers*, Visit to Honduras, Human Rights Council, A/HRC/44/47/Add.2, page 4 (June 15-July 3, 2020): <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G20/124/49/PDF/G2012449.pdf?OpenElement>

<sup>7</sup> *Report of the Special Rapporteur on the independence of judges and lawyers*, Visit to Honduras, Human Rights Council, A/HRC/44/47/Add.2, page 4 (15 June-3 July 2020): <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G20/124/49/PDF/G2012449.pdf?OpenElement>. *In its general comment no. 32 (2007), on the right to a fair trial and equality before courts and tribunals, the Human Rights Committee noted that the requirement of independence and impartiality of a tribunal referred, in particular, to the procedure for the appointment of judges, and guarantees in relation to their security of tenure, conditions governing promotions, transfers, suspension and removal from office, and the effective independence of the judiciary from political interference by the executive and legislative branches.*

<sup>8</sup> *Central American democracy has no future with a co-opted judicial system*, El Faro , Claudia Paz y Paz (June 18, 2021): <https://elfaro.net/es/202106/columnas/25549/La-democracia-centroamericana-no-tiene-futuro-con-un-sistema-judicial-cooptado.htm>

<sup>9</sup> Constitution, Article 317.

<sup>10</sup> Report of the Special Rapporteur on the independence of judges and lawyers, Visit to Honduras, Human Rights Council, A/HRC/44/47/Add.2 (June 15-July 3, 2020): <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G20/124/49/PDF/G2012449.pdf?OpenElement>.

<sup>11</sup> Serious attack on democracy in Honduras the dismissal of judges of the Constitutional Chamber, Office of the High Commissioner, United Nations (January 29, 2013): <https://newsarchive.ohchr.org/SP/NewsEvents/Pages/DisplayNews.aspx?NewsID=12958&LangID=S>

<sup>12</sup> Case of Gutiérrez Navas et al. v. Honduras, Merits, Reparations and Costs, November 29, 2023, paragraph 103: [https://www.corteidh.or.cr/docs/casos/articulos/seriec\\_514\\_esp.pdf](https://www.corteidh.or.cr/docs/casos/articulos/seriec_514_esp.pdf).

<sup>13</sup> International sanction for violation of judicial independence, Prensa Gráfica, April 8, 2024: <https://www.laprensagrafica.com/opinion/Sancion-internacional-por-violacion-a-independencia-judicial-20240407-0061.html>

<sup>14</sup> Report of the Special Rapporteur on the independence of judges and lawyers, Visit to Honduras, Human Rights Council, A/HRC/44/47/Add.2, paragraph 85 (June 15-July 3, 2020): <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G20/124/49/PDF/G2012449.pdf?OpenElement>.

<sup>15</sup> Report of the Special Rapporteur on the independence of judges and lawyers, Visit to Honduras, Human Rights Council, A/HRC/44/47/Add.2, paragraph 85 (June 15-July 3, 2020): <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G20/124/49/PDF/G2012449.pdf?OpenElement>.

<sup>16</sup> U.S. speaks out after Honduras' Judiciary is attacked, La Prensa, February 17, 2024: <https://www.laprensa.hn/honduras/estados-unidos-pronunciamiento-mensaje-brian-nichols-zarpazo-ilegalidad-rotaciones-salas-poder-judicial-csj-PB17618142>

<sup>17</sup> Preliminary observations on the official visit to Honduras, United Nations Special Rapporteur on the independence of judges and lawyers, Mr. Diego García-Sayán (22 August 2019): <https://www.ohchr.org/es/2019/08/observaciones-preliminares-visita-oficial-honduras?LangID=S&NewsID=24910>

<sup>18</sup> Preliminary observations on the official visit to Honduras, United Nations Special Rapporteur on the independence of judges and lawyers, Mr. Diego García-Sayán (22 August 2019): <https://www.ohchr.org/es/2019/08/observaciones-preliminares-visita-oficial-honduras?LangID=S&NewsID=24910>

<sup>19</sup> *Justice reactivates "Red de Diputados" case with which the MACCIH initiated the anti-corruption fight*, Criterio (March 15, 2022): <https://criterio.hn/justicia-reactiva-caso-red-de-diputados-con-el-que-la-maccih-inicio-lucha-anticorrupcion/>



- <sup>20</sup> *Presidential re-election approved in Honduras*, BBC News (April 24, 2015): [https://www.bbc.com/mundo/ultimas\\_noticias/2015/04/150423\\_ultnot\\_reeleccion\\_presidencial\\_honduras\\_lav](https://www.bbc.com/mundo/ultimas_noticias/2015/04/150423_ultnot_reeleccion_presidencial_honduras_lav) See also: Central American democracy has no future with co-opted judicial system, El Faro, Claudia Paz y Paz (June 18, 2021): <https://elfaro.net/es/202106/columnas/25549/La-democracia-centroamericana-no-tiene-futuro-con-un-sistema-judicial-cooptado.htm>
- <sup>21</sup> *Central American democracy has no future with a co-opted judicial system*, El Faro, Claudia Paz y Paz (June 18, 2021): <https://elfaro.net/es/202106/columnas/25549/La-democracia-centroamericana-no-tiene-futuro-con-un-sistema-judicial-cooptado.htm>
- <sup>22</sup> *Honduran court orders release of six convicted environmentalists*, DW (Feb. 11, 2022): <https://www.dw.com/es/corte-de-honduras-ordena-liberar-a-seis-ambientalistas-condenados/a-60739826>
- <sup>23</sup> *CNA warns about magistrates who seek to benefit in cases denounced for corruption*, La Prensa, (February 9, 2022): <https://www.laprensa.hn/honduras/cna-alerta-sobre-magistrados-que-buscan-beneficiar-en-casos-denunciados-por-corrupcion-DA5640243>
- <sup>24</sup> <https://www.laprensa.hn/honduras/estados-unidos-dispuesto-a-apoyar-a-honduras-en-la-instalacion-de-la-cicih-AH5687301>
- <sup>25</sup> *CICIH in a promise after 27 months of Xiomara Castro's government*, El Herald, April 23, 2024: <https://www.elheraldo.hn/honduras/cicih-promesa-gobierno-xiomara-castro-HC18839619>
- <sup>26</sup> *Ana María Méndez Dardon, What's Next for Honduras after Juan Orlando Hernández' Conviction*, WOLA, April 11, 2024: <https://www.wola.org/analysis/honduras-after-juan-orlando-hernandez-conviction/>.
- <sup>27</sup> *Honduras: Events of 2021*, Human Rights Watch: <https://www.hrw.org/es/world-report/2022/country-chapters/380720>