

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

March through September 2026

October 2026

INSTITUTE FOR JUSTICE & DEMOCRACY IN HAITI

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 Audrey Jeannine Smith and University of California, Irvine School of Law students Luke Antoun and Rheem Khodor for their extensive pro bono contributions to preparing this Update.

IJDH is likewise deeply grateful to the following individuals and organizations for their input and feedback on drafts, and for their solidarity and collaboration with IJDH work: *100% FANM* (*SAN POU SAN FANM*), Jean-Gerard Clervil, Diego Da Rin, Abigail Derolian, Marie Kattia Dorestant Lefruy, Rosy Auguste Ducéna, Dieunel Fleury Jean, the Haitian Women's Collective, Jake Johnston, Michelle Karshan, Origène Louis, Laurore Michel, *MARIJÀN*, Mutchi Obas, *Ordre des Défenseurs des Droits Humains* (ORDEDH), *Organisation des Femmes Solidaires* (OFASO), Pascale Solages, and *RÈG Ayiti*.

INSTITUTE FOR JUSTICE & DEMOCRACY IN HAITI

Table of Contents

Table of Acronyms ..... **iii**

Executive Summary ..... **iv**

I. Introduction ..... **iv**

II. Violations of the right to life & security of the person **2**

Violence by armed groups and related displacement *3*

Continuing kidnapping epidemic *4*

Government failure to protect civilians, including human rights defenders and journalists *4*

III. Government misconduct, including institutionalized violence & corruption **5**

IV. Lack of access to justice & chronic impunity **6**

Justice sector dysfunction and chronic impunity *6*

Inhumane prison conditions *7*

V. Lack of equal rights & protections **8**

VI. Collapse of economic & social rights **10**

Economy in decline *10*

Access to water *10*

Access to food *11*

Access to healthcare *11*

Access to education *12*

VII. Emigration pressures **12**

VIII. Failures of the international community to respect the rights of Haitians **14**

Notes **16**

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Table of Acronyms

BAI	*Bureau des Avocats Internationaux* (Office of International Lawyers)
BINUH	United Nations Integrated Office in Haiti
BSAP	*Brigade de Sécurité des Aires Protégées* (Haiti's Brigade for the Security of Protected Areas)
CBP	U.S. Customs and Border Protection
CSPJ	*Conseil Supérieur du Pouvoir Judiciaire* (Haiti's Superior Council on Judicial Power)
DHS	U.S. Department of Homeland Security
GSF	Gang Suppression Force
ICRC	International Committee of the Red Cross
IJDH	Institute for Justice and Democracy in Haiti
IOM	International Organization for Migration
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	*Pati Ayisyen Tèt Kale* (Haitian Tèt Kale Party)
PNH	*Police Nationale d'Haïti* (Haitian National Police)
TPS	Temporary Protected Status
ULCC	*Unité de Lutte Contre la Corruption* (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 Program



Executive Summary

Since IJDH's last Update on Human Rights and the Rule of Law in Haiti in March 2026, Haiti's security and human rights crisis has deteriorated further. The government and its international partners remain focused on security without addressing the underlying root causes of the crisis, which include state capture, corruption, and impunity. The consequences are an increasingly militarized response that is resulting in civilian harms without improving security; a disastrous humanitarian situation; a further dismantling of accountability and anti-corruption structures; and an electoral process that is contributing to violence and corruption without bringing the Haitian people any closer to meaningfully choosing their government.

The inadequate and incoherent response to Haiti's crisis has enabled armed groups to extend their influence and evolve their operations to build resilience. They now reach deeper into Haiti's rural heartland and have consolidated systems of parallel governance in areas under their control, using extreme brutality to assert their dominance over the population. Highly coordinated massacres and mass kidnappings are being used as political leverage and retaliation for security operations, with deadly consequences for civilians. Over 3,300 people were killed between January and July 2026, and nearly 1.5 million are displaced by violence. Haiti's police remain weak and largely ineffective at controlling armed group violence. The government's continuing reliance on unaccountable nonstate actors, including civilian "defense" groups and foreign security contractors, has resulted in further human rights abuses without any material security gains, and complicates prospects for peace.

State capture, corruption, and collusion between state actors and armed groups continue to shape Haiti's crisis. Credible allegations of corruption and complicity with criminal groups implicate officials from the highest levels of government down to rank-and-file police. Police and other actors continue to commit extrajudicial killings and grave civilian harms in the context of security operations. Haiti's justice system remains largely unable to investigate or prosecute these or other serious crimes. Chronic under-resourcing and insecurity have severely reduced court function, and impunity remains the norm. Continued politicization of the judiciary and recent government initiatives to reduce transparency and immunize high-level officials from accountability for corruption exacerbate these challenges. Deadly prison conditions and extreme rates of pretrial detention remain unaddressed as grave human rights violations and compound the challenges to an effective demobilization and reintegration effort.

The insecurity and humanitarian crises continue to disproportionately impact Haitians already struggling to survive at the margins. Dedicated resources, protections, and services are inadequate and remain affected by funding cuts. Further sharp rises in sexual violence against women and girls were documented this reporting period without adequate government response. Women remain marginalized in leadership, policy priorities, and across all aspects of public life, violating their rights and weakening the effectiveness of government and crisis responses. Haiti also remains one of the most dangerous places for children in the world due to acute privations, rising forced recruitment by armed groups, violent attacks, and other widespread human rights violations by both government and other armed actors.

Haiti's already catastrophic social and economic landscape has deteriorated further. Approximately half of the population lives below the poverty line and about 5.8 million are acutely food insecure. The World Food Program designated Haiti a "hunger hotspot" for the third year running. Widespread school and hospital closures continue to impact hundreds of thousands.

In the face of these combined challenges, there has been a surge of racist, inhumane and, in some cases, illegal deportations of Haitians, primarily from the Dominican Republic and the United States. The U.S. government terminated Temporary Protected Status for Haitians in August, leaving hundreds of thousands of Haitians at immediate risk of deportation to conditions that the U.S. government itself acknowledges are unsafe. Returned Haitians are extremely vulnerable to further violence, exploitation, and displacement.

The international response to these challenges continues to prioritize short-term, militarized engagement while neglecting the structural causes of the crisis. The new Gang Suppression Force, despite absorbing significant investments of time and money, is ill-matched to the complexity of Haiti's crisis, and remains under-resourced and largely ineffective. Foreign (mostly U.S.) weapons continue to flow in. At the same time, humanitarian funding has declined sharply, even as needs continue to grow, while international actors focus intensely on supporting the transitional government's push for elections despite broad consensus that the process is not designed to ensure that they are free or fair (or happen at all).

I. Introduction

This reporting period[I] saw a further deterioration of Haiti's already-catastrophic human rights situation.[1] The response, from both Haiti's government and the international community, has remained inadequate and incoherent.[2] It has focused on security to the exclusion of other dimensions of Haiti's crisis – including state capture,[II] corruption, impunity, and human rights abuses more generally.[3] The response also lacks a comprehensive strategy, even for its security dimensions. In combination, these shortcomings have enabled armed groups to continue evolving their tactics so as to maintain and extend their reach, including into the political and electoral spaces.[4] The militarized nature of the response has also continued to foster the proliferation of unaccountable armed actors with divergent agendas, an increase in civilian deaths and other human rights violations, and the continued marginalization of Haiti's civil society.[5] Without a change to approach, it is difficult to see a path towards sustained improvement in Haitians' lives: the recent predictable and predicted[6] delay in the electoral calendar is the latest instance of policy focus that is misaligned with the realities on the ground.

An increasingly militarized security apparatus that is heavily reliant on foreign support remains the centerpiece of Haiti's crisis response, even as it continues to yield few material improvements. Foreign actors, especially the U.S. government, pushed through a transition from the failed Multinational Security Support (**MSS**) Mission to the more militarized Gang Suppression Force (**GSF**).[7] But even as they expended considerable resources, political capital, and attention on the transformation, they failed to invest in the functionality of the mission and neglected the the non-security dimensions of the crisis, making the GSF a poor match for Haiti's complex and deeply-entrenched crisis.[8] Even with respect to security, the GSF has made clear that it views its mandate in exceedingly narrow terms, taking no responsibility, for example, for the failures enabling two of the most violent attacks of the past five years in Kenscoff.[9] The GSF also falls short on capacity even by its own narrow definitions of scope. A year into its authorized activities, the GSF has only 1,500 troops – about the same number as the failed MSS, and just 27% of its target staffing.[10] And the mission may be running out of time already: the UN Security Council (**UNSC**) recently reauthorized the GSF for only six months – a sharp retrenchment from the two years its leadership said would be required to make progress, and a material departure from a consistent prior practice of one-year renewals.[11] The Haitian government has in parallel extended contracts with unaccountable private security contractors for use of armed drones that generate mass civilian casualties; continued its reliance on civilian "defense" groups that are increasingly committing human rights abuses themselves; and spent significant funds on lobbying in Washington.[12]

Both the Haitian government and its international partners have defended their militarized approach by pointing to several successful individual confrontations with armed groups, which have freed some areas in downtown Port-au-Prince.[13] But all major roads remain under armed group control, the capital's airport remains closed to international air traffic, armed groups continue to expand their reach and influence, and the small territorial gains have not materially impaired the ability of armed groups to terrorize, extort, and recruit.[14] Haiti's police remain understaffed, underfunded, and under-resourced, including because government actors continue to collude with armed groups.[15] And both the government's security forces and the GSF remain demonstrably unable to protect against large attacks – even when given advance warning.[16] Their major operations have provoked deadly retaliatory strikes and increased recruitment that leave civilians worse off.[17] This fragmented approach has moreover allowed and provoked an evolution in armed group tactics, including meticulously planned, high casualty attacks and mass kidnappings for political leverage and a reduced reliance on territorial control per se.[18] Armed groups also continued their expansion deep into Haiti's rural heartland, resulting in mass displacement and devastating impacts on farmers and food security.[19] This is a growing sophistication and diversification of fighting capacity that will make it even harder for the security response to succeed.[20]

[I] This Update covers the period from March 1 through September 30, 2026. 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] State capture is a form of systematic corruption where narrow private or public interest groups manipulate the institutions and processes through which public policy is made to serve themselves, rather than the common good.

At the same time, the transitional government under Prime Minister Fils-Aimé made no material strides toward re-establishing effective government functions and remains mired in corruption allegations.[21] It has largely failed to implement the February 2026 Pact setting out its mandate, and broader commitments to tackling necessary anti-corruption and governance reforms[22] remain unmet.[23] Instead, Fils-Aimé and his Council of Ministers kept in place broadly-criticized December 2025 decrees that decrease transparency and effectively shield top officials from accountability,[24] and then replaced the head of Haiti's Anti-Corruption Agency after he criticized related impunity implications.[25]

The government, which asserts a right to stay in power until elections are held, has in the meantime presented a complicated, widely distrusted, electoral process that predictably generates repeated delays while disenfranchising voters.[26] From the start, observers have questioned the feasibility of holding elections in 2026 given lack of progress in tackling insecurity.[27] As of writing, fewer than 600,000 Haitians (roughly 7% of eligible voters) had registered to vote,[28] and officials had not made meaningful efforts to include marginalized groups[29] while acknowledging that any near-term contest would require the exclusion of most voters in Haiti's two largest Departments (West and Artibonite).[30] Prime Minister Fils-Aimé has taken increasingly unilateral control over the process by interfering with the intended independence of the Provisional Electoral Council (**CEP**),[31] most notably with respect to loosening candidacy restrictions in the electoral decree. Those restrictions had initially barred individuals from running as candidates if they were subject to foreign sanctions for corruption or support for armed groups.[32] The dynamic of emphasizing elections over other governance priorities, while accepting the exclusion of large sectors of the public from voting and clearing the path for politicians credibly accused of having ties to criminal networks to seek office, raises serious concerns regarding consolidation of state capture, corruption, and impunity.[33] Evidence of political and electoral dimensions to some of the armed group attacks presented by the UN Panel of Experts further deepen those concerns.[34]

The international community responses are fragmented and inconsistent. At their worst, they enable the violence, state capture, and corruption described above.[35] For example, the continued flow of weapons and ammunition into Haiti, primarily from the United States, fuels the scale and severity of the violence,[36] at the same time that resources are poured (however ineffectively) into the GSF. Further, a history of harmful foreign interference in Haiti's elections, which directly contributed to creating the present crisis,[37] seems poised to be repeated. International actors have offered significant support to the government despite anti-democratic and corrupt initiatives inconsistent with explicit human rights principles and best practices.[38] For example, the UN Integrated Office in Haiti (**BINUH**) endorsed the latest electoral decree that Haiti's own electoral authority denounced as unconstitutional for unilateral changes giving the functioning executive unprecedent control over the process.[39] At the same time, international funding for the humanitarian response remains grossly inadequate relative to soaring needs, which are at the same time being exacerbated by an inhumane increase in deportations,[40] even as they actively increase recruitment into armed groups.[41]

The lack of progress towards restoring stability and a government accountable to its people – or even a strategy credibly designed to do so – is evident in the continuing deterioration of the security situation, rising forced recruitment of children, the absence of a strategy for disarming and reintegrating those children and other members of armed groups,[42] and the desperate humanitarian situation. It is also starkly apparent in the frustration of the Haitian people, most of whom have not registered to vote either because they do not want to or are not able to under current plans,[43] as well as some of the candidate choices they have been presented with so far: former President and *Pati Ayisyen Tèt Kale* (**PHTK**) founder Michel Martelly, who is subject to U.S. and Canadian sanctions for collusion with armed groups and has been credibly implicated in drug trafficking and corruption scandals;[44] Joseph Wilner, who represents the political platform launched by Prime Minister Fils-Aimé and is seen by many as a way for Fils-Aimé to cling to power;[45] and Jean Ernest Muscadin, the Miragoâne public prosecutor who has publicly executed at least 99 people outside of the law since 2022 with complete impunity.[46]

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

Haiti's already-catastrophic violence has again grown worse.[47] Armed groups have adapted their tactics to exploit deficiencies in Haiti's security strategy, carrying out multiple highly coordinated massacres and using mass kidnapping events as political leverage as well as to generate income. Widespread displacement has continued to increase. The resulting desperate economic and humanitarian situation (see Section VI) fuels ongoing recruitment by armed groups, furthering cycles of violence. Haiti's government security

forces remain unable to effectively protect the population from armed groups. The government has continued to rely on unaccountable armed non-state actors like civilian "defense" groups and private military contractors to supplement its security response. The result has been an uptick in human rights abuses without any sustained and material security gains. More generally, the proliferation of armed actors with private agendas and effectively no accountability or oversight structures fuels chaos, complicates pathways to peacebuilding, and further undermines government authority.

Violence by armed groups and related displacement

- Armed groups are increasingly extending their reach into rural areas previously less affected by violence,[48] even as they retain control over large parts of the West, Artibonite, and Center Departments.[49] New alliances and tactics in rural areas – including repeated "lightning raids" and mass kidnappings[50] – enable armed groups to expand control over infrastructure and transportation without the need to occupy territory permanently, which allows them to use their resources more efficiently to increase criminal activity elsewhere.[51] The consequences for Haitians have included more targeted attacks against civilians,[52] extreme restrictions on freedom of movement at the local and national levels,[53] and severely reduced access to basic needs and services.[54]

- The scale of violence remains catastrophic: at least 3,373 people were killed due to armed group violence between January and July 2026.[55] Armed groups perpetrated a number of coordinated, highly deadly massacres during the reporting period.[56] At the end of March 2026, the *Gran Grif* armed group killed at least 95 people and burned 115 homes during attacks on three communes in the Artibonite Department;[57] In the worst of these attacks, in Jean-Denis, armed group members killed 70 people and displaced over 5,000.[58] Armed groups operating as part of the *Viv Ansanm* coalition[59] carried out two massacres in Kenscoff in early July and late August 2026, killing at least 164 people, kidnapping at least 71 (including as part of a mass hostage-taking[60]), and displacing thousands.[61]

- Armed groups continue to employ calculated brutality during attacks and as a means of enforcing systems of criminal governance in areas under their control.[62] Abuses include targeted executions;[63] burning people alive;[64] sexual violence;[65] mutilation;[66] severe, sometimes deadly, beating;[67] indiscriminate shooting;[68] and destruction and looting of property, especially through arson.[69] Armed groups often disseminate videos of their assaults on social media to amplify the impact as tools of terror and control, recruit children, and increase revenue through monetized accounts.[70] In areas they control to the exclusion of any state presence, armed groups maintain systems of parallel governance, portraying themselves as "protectors" and performing government functions, including levying taxes, and providing government services.[71] Armed groups use their control to extort money directly from businesses and through severe restrictions on movement and access to services.[72] For example, they have killed or maimed civilians who attempt to evade checkpoints; fail to pay tolls; refuse recruitment; are suspected of collaborating with police, civilian "defense" groups, or rival armed groups; or simply try to leave.[73] In some areas, armed groups have established their own "justice" systems, holding "trials" for individuals who defy their authority with punishments including captivity, fines, and death.[74]

- Insecurity-related displacement continues to increase, with nearly 1.5 million people reported displaced as of August 2026.[75] Attacks in late August and September caused further – for some people, repeated – displacement.[76] According to the International Organization for Migration (**IOM**), over 220,000 internally displaced persons (**IDPs**) – nearly all of whom are in the Port-au-Prince metropolitan area – are living in 236 makeshift and fluctuating displacement sites,[77] including schools, churches, and other public spaces.[78] Displacement continues to put significant strain on host communities already struggling due to the humanitarian crisis.[79] Conditions in displacement sites remain inhumane, with overcrowding; inadequate access to food, clean water, sanitation, and healthcare; and rampant disease.[80] IDPs also remain at serious risk of violence[81] – especially in the over 15 displacement sites located in areas controlled by armed groups, where social stigma and economic barriers prevent IDPs from moving elsewhere.[82] The situation for women and children – who make up the significant majority of the displaced population[83] – is particularly dire, including because they face increased risk of gender-based violence (**GBV**[III]).[84] Whatever state support or protections for IDPs that exist remain inadequate.[85]

[III] According to the UN, GBV is "an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private." UN High Commissioner for Refugees (**UNHCR**), *Gender-based Violence*, https://www.unhcr.org/gbv-toolkit/_test/ (last visited Sep. 8, 2026).

Efforts by humanitarian organizations to provide assistance to IDPs are insufficient to meet needs and, as in previous reporting periods, are hampered by insecurity and underfunding.[86]

- Targeted violence and impunity, alongside increased government repression,[87] continue to shrink civic space and threaten freedom of press.[88] Kidnappings, in particular, have increased. For example, journalists Osnel Espérance and Junior Célestin are presumed dead after being abducted by armed group members on March 13;[89] community radio station director and rural community advocate Joseph Willard Vancol disappeared after an armed group attack on his radio station in August, and was found beheaded on September 9;[90] and Radio-TV Métropole journalist Wesly Renaud Jean was abducted by armed group members on September 6 and released three weeks later.[91] Journalists – especially field reporters – often work without adequate resources and face suspicion from both police and armed groups, putting them at greater risk.[92] The government persistently fails to adequately protect against, investigate, and prosecute such threats and attacks.[93]

Continuing kidnapping epidemic

- Armed groups are using kidnappings as a deliberate strategy to exert power over the state.[94] The result has been a surge in kidnappings characterized by increased planning and coordination, targeting of prominent public officials, and mass hostage-taking.[95] For example, during the August 2026 Kenscoff attack, an armed group abducted more than 50 people, using them as leverage to prevent security forces from attempting to take back the area.[96] A month later, the *Palmiste* and *Gran Grif* armed groups took over 500 civilians hostage in Petite Rivière de l'Artibonite for two days, using them to negotiate the release of two armed group members who had been arrested.[97] Armed groups also kidnapped high-ranking members of the Defense, Foreign Affairs, and Education Ministries, alongside other government officials and police officers.[98]

- Over 230 people were reported kidnapped between January and September 2026, according to the UN.[99] The real number is even higher, as many families choose not to report kidnappings out of fear that doing so will lead to reprisals or higher ransoms, and instead negotiate with armed groups directly.[100] Distrust of police also contributes to underreporting, particularly amid increasing evidence of kidnappers colluding with or posing as police officers.[101] No one is immune from kidnapping, but perceived access to money, including people who have U.S. connections, heightens the risk.[102] Kidnapping is often accompanied by additional violence, including sometimes videotaped physical and sexual assault, as a mechanism for extorting higher ransoms.[103] Those who resist kidnappings are often killed.[104]

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

- The Haitian National Police (**PNH**) continues to lack sufficient trained personnel, resources, and equipment, as well as logistical and technical capabilities to effectively confront armed groups,[105] despite longstanding foreign initiatives to reinforce PNH infrastructure and operational capacity.[106] The reconstituted Haitian Armed Forces (**FAd'H**)[107] are now more involved in security operations, but likewise remain under-resourced and unable to effectively support the PNH.[108] The number of police officers currently on the force is unclear, with estimates ranging from 10,000 to 13,000.[109] However, many of these are not actively involved in operations against armed groups – the International Crisis Group's Haiti analyst shared that the number of combat-ready officers is likely fewer than 1,000.[110] Many PNH officers, particularly from specialized units, are used by public officials for private security, further reducing the number of police available for public protection.[111] Persistent government failures to augment the PNH budget or pay officers a timely and sufficient salary undermine ongoing recruitment efforts.[112] State failures to properly resource and equip police officers also increase their vulnerability to armed group violence: armed groups killed or kidnapped at least 35 officers and carried out 8 attacks on police infrastructure between June 2025 and June 2026.[113]

- Government security forces overstate the materiality and sustainability of their successful operations against armed groups,[114] as demonstrated by their failure to prevent several recent large-scale attacks despite receiving advance warnings.[115] The failure to defend Kenscoff is particularly egregious because the community has long been considered highly strategic. In fact, following a January 2025 massacre that killed over 135 people, the UN and the U.S. Government worked with the Haitian police to develop a plan to reinforce the municipality. But over the ensuing months, 60% of the police officers posted at Kenscoff were transferred somewhere else. A few days before the August massacre – and a few weeks after a smaller attack in July – the police removed the last armored car from Kenscoff because there were no longer enough officers there to operate it.[116] Armed groups are also retaining the upper hand by

shifting tactics that exploit the structural deficiencies described above, with the result that security forces are spread even thinner and are unable to deploy on multiple fronts.[117] In some areas, there is no police presence at all, leaving residents at the mercy of armed groups.[118] Limited incursions without sustained pressure paradoxically risk exacerbating the insecurity, as they provoke retaliatory attacks by armed groups.[119]

- The government continues to rely on private security contractors in its security response.[120] The number of these companies operating in Haiti remains unclear, but at least two with ties to Erik Prince[121] – and possibly a third[122] – have been contracted to assist a government-created task force operating independently of the PNH, and to play a role in Haiti's customs and immigration services through a ten-year contract that promises the security contractor a percentage of customs revenue.[123] There is no evidence of human rights monitoring or accountability mechanisms overseeing their functions.[124] The use of deadly force by private foreign entities without clear government oversight is both a concerning human rights development and represents a vector of instability that is not justified by meaningful security gains.[125]
- The proliferation of civilian "defense" groups with distinct agendas and their increasing integration with both national security forces and armed groups continues to blur the line between civilians and combatants, contribute to the circulation of illegal weapons, and perpetuate cycles of violence.[126] In some areas "defense" groups are the only line of protection against armed group violence.[127] They also continue to perpetrate human rights abuses: civilian "defense" groups killed at least 182 people between January and June 2026, including children.[128] All the killings are extrajudicial and many target individuals without direct evidence of their affiliation with armed groups.[129] Police openly operate in tandem with armed civilians and facilitate their access to weapons, including from already inadequate PNH stockpiles.[130] Some "defense" groups also increasingly engage in criminal activities unrelated to community protection, including extortion and other violence, and have even aligned themselves with certain armed groups.[131] Others are working as private security for individuals and businesses in Port-au-Prince.[132]

III. Government misconduct, including institutionalized violence & corruption

The practice of capturing and retaining political power, often leveraged for purposes of extracting wealth and further power for oneself and one's close associates and achieved through collusion with armed groups, is at the root of Haiti's crisis and continues to shape the present context.[133] Government officials at every level remain implicated in armed group violence, misuse of public funds and official powers, and drugs and weapons trafficking. The continued institutionalization of corruption and impunity was sharply affirmed when Prime Minister Fils-Aimé fired the director of Haiti's Anti-Corruption Unit (**ULCC**) after the latter briefed the UNSC about a decree that Fils-Aimé's government issued in December 2025 that shields high level officials from accountability for corruption and other misdeeds.[134] The removal calls into question the future of cases the ULCC has already built against powerful individuals. The Fils-Aimé government – despite publicly stating that combatting corruption is a priority[135] – has not put forward any anti-corruption strategy itself.[136] The dynamics described in the Introduction around planning elections – including negotiations to weaken provisions of the electoral decree designed to exclude individuals who are credibly linked to criminal activitiy – raise similar concerns and indicate an effort to perpetuate corrupt state capture. The UN Panel of Experts in its latest report further presented evidence that political motives are shaping some of the attacks and criminal activity by armed groups, including specifically in the context of elections.[137] Police and other government actors also continue to use illegal, indiscriminate, and extrajudicial force, with impunity.

- Persistent collusion between state actors and armed groups remains a significant barrier to restoring security and good governance in Haiti.[138] Long-standing credible accusations of complicity with armed groups leveled against public officials at the highest level remain unanswered.[139] Collusion between PNH officers and armed groups likewise remains widespread,[140] and armed group leaders are often warned in advance of security operations or given financial incentives to leave certain areas.[141] There is also consistent evidence that police officers – and possibly members of the Haitian Armed Forces – provide weapons to armed groups.[142] In the rare instances where criminal cases have been initiated against senior public officials for their ties to armed groups, the cases have either not progressed or been dismissed.[143] New allegations against political and economic elites for financing criminal activities and complicity in weapons trafficking and land theft schemes have continued to emerge.[144] The prevalence of such allegations and related impunity, combined with the removal of rules preventing candidates with

ties to criminal organizations from running, raises serious concerns about the credibility of any upcoming elections.[145] For example, former President and PHTK founder Michel Martelly is under U.S. and Canadian sanctions for financing armed groups and drug trafficking, and has been credibly implicated in corruption scandals,[146] while his administration was responsible for much of the systematic dismantling of Haiti's democratic and accountability structures.[147] Mr. Martelly is now a registered candidate in the planned presidential election.[148]

- Pervasive corruption at all levels of government continues to undermine state function.[149] Haiti ranks 169th out of 180 countries on Transparency International's 2025 Corruption Index.[150] Civil society organizations have raised concerns about multiple contracts signed by the transitional government, which they say are at best an improper and extravagant use of public funds and a violation of national sovereignty, and at worst an indication of serious corruption.[151] The ULCC and the UN Panel of Experts continue to issue extensively supported reports implicating high-level government officials in corruption and malfeasance.[152] Yet the vast majority of cases remain unprosecuted and impunity for financial crimes persists.[153] These dynamics reflect 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.[154]
- Security forces continue to use excessive force against civilians in the form of indiscriminate and extrajudicial killings and deliberate suppression of public criticism. According to the UN, police killed at least 1,733 people in the course of operations against armed groups from January to June 2026.[155] Approximately 18% of those killed are confirmed as unaffiliated with armed groups,[156] indicating a continued pattern of unlawful use of lethal force.[157] Drone strikes alone killed at least 50 civilians, including 9 children, between January and June 2026, an increase from the previous year.[158] Their continued use – particularly in poor, heavily populated areas where avoiding harm to civilians, including humanitarian actors,[159] is virtually impossible – continues to raise serious concerns around abuses and lack of accountability.[160] In addition, police extrajudicially executed at least 54 people, including children, in the first six months of 2026.[161] Officers continue to be implicated in kidnapping schemes, extortion, and coerced confessions.[162] Police also used tear gas to violently repress people exercising their right to protest against state failures, leading to civilian injuries;[163] in one instance in July, a police officer allegedly shot at students demanding the urgent relocation of the State University Hospital.[164] Efforts to investigate and prosecute these abuses are limited and impunity remains the norm.[165]

IV. Lack of access to justice & chronic impunity

Chronic neglect and deliberate dismantling of the justice sector by successive corrupt governments, compounded by the acute insecurity crisis, has rendered Haiti's justice sector unable to deliver justice for the vast majority of Haitians.[166] Institutionalized corruption and politicization of the judiciary – alongside a lack of political will to hold perpetrators of grave crimes accountable[167] – further entrench impunity, which in turn fuels the cycles of violence.[168] Accompanying due process violations,[169] including consistently high rates of pretrial detention, are exacerbated by the inhumane conditions in Haiti's prisons.

Justice sector dysfunction and chronic impunity

- Chronic under-resourcing of the justice sector, exacerbated by the acute insecurity crisis, continues to impede court operations.[170] Peace Courts in multiple jurisdictions remain closed because of armed group violence; just 2 of 15 in the Port-au-Prince region are fully functional.[171] Consistent state failures to protect or effectively relocate higher courts that have faced insecurity-related closures have further disrupted courthouse functions.[172] For example, the Port-au-Prince Court of First Instance has been relocated three times since being forced out of its original premises by armed groups in 2022. Advocates report that none of the three locations have met the needs of the court, which had not held any jury trials in over eight years[173] until a limited session was held in July 2026.[174] Closures and relocations also aggravate economic and geographic barriers to accessing justice: residents of working class neighborhoods and the Port-au-Prince city center who wish to pursue their cases face dangerous and expensive travel to reach still-functioning courts in other areas.[175]
- The government's already-miniscule justice budget has shrunk further, now representing just 1.2% of the national budget.[176] The results are salaries that are too low to meet needs, insufficient resources, and inadequate security for judicial staff.[177] Frequent strikes by court personnel in response to these failures – sometimes lasting months at a time – have periodically brought the justice system to a complete

standstill.[178] Many well-trained judicial professionals have left Haiti altogether, contributing to chronic under-staffing across the judiciary.[179]

- Corruption and politicization remain deeply entrenched throughout the judiciary – including the very institutions created to combat them[180] – and likewise continue to erode access to justice.[181] Since June 2026, the Superior Council of the Judiciary (**CSPJ**) – the independent body responsible for the administration and discipline of judges – has upheld the non-certification of 43 judges for lack of moral and professional integrity.[182] Alleged criminals with links to political and economic elites, access to money, or connections with armed groups generally avoid prosecution,[183] including because presiding judges systematically route politically sensitive matters to investigating judges known to be compliant, shielding allies from accountability.[184] Low salaries and general economic pressures increase judicial officials' vulnerability to bribery.[185] Persistent threats and attacks against judicial actors likewise weaken judicial function and independence.[186]

- The challenges described above perpetuate impunity, with the majority of grave crimes – including sexual violence[187] – going unaddressed.[188] There has been minimal to no progress even in high-profile cases.[189] After over five years of delays, corruption allegations, and threats against investigating judges,[190] not a single person has been charged in Haiti for the July 2021 assassination of President Jovenel Moïse.[191] The investigation into the 2024 Wharf Jérémie massacre restarted in March 2026, after being suspended for five months, but no material progress has been made.[192] Investigations into numerous other high-profile massacres;[193] the PetroCaribe corruption scandal;[194] and the assassinations of former Port-au-Prince Bar Association President Monferrier Dorval,[195] political activist Antoinette Duclair, journalist Diego Charles[196] remain stalled. The government has made various public commitments to tackling impunity, but its actions and policies remain ineffective at best and deliberately obstructive at worst.[197] The two specialized judicial units created by the transitional government in April 2025 to investigate and prosecute financial and mass crimes are still not fully operational.[198] Progress in staffing the units has been marred by credible allegations that some of the selected judges and prosecutors are implicated in corruption, have ties to armed groups, or are not qualified to hold the position.[199]

Inhumane prison conditions

- Catastrophic overcrowding in Haiti's prisons remains an ongoing and extreme human rights violation.[200] According to the UN, Haiti's prisons are at over 300% capacity, with barely one square foot of space per person.[201] As a result, women and children continue to be held in the same facilities as men. For example, the Rehabilitation Center for Minors in Conflict with the Law (**CERMICOL**), designed to hold 93 children, is now the only prison still operating in the Port-au-Prince area and houses more than 760 men, women, and children.[202] Authorities also continue to incarcerate people in makeshift cells in police stations, in similarly overcrowded and inhumane conditions.[203] In at least one case, police reportedly detained people in a house.[204] Government initiatives to reduce the number of people held in pretrial detention – some for over 15 years – remain limited,[205] and rates have stayed high at approximately 82%.[206] The underlying due process violations raise serious concerns about the ability of any foreign mission to Haiti to detain individuals in accordance with applicable law[207] – particularly children, for whom prolonged pretrial detention poses distinct risks.[208]

- The state remains unable to provide incarcerated persons with adequate access to food, water, sanitation, and healthcare.[209] Incarcerated individuals depend mainly on family members, civil society organizations, or fellow detainees for food and water.[210] As a result, poor detainees who lack outside support are disproportionately impacted.[211] Healthcare in the prisons is extremely limited and lacks effective screening and quarantines for infectious disease.[212] These conditions have deadly consequences: the UN reported at least 125 deaths in Haiti's prisons since January 2026 alone, primarily due to the unsanitary conditions and lack of access to adequate food, drinking water, and healthcare.[213] Chronic underfunding and poor working conditions for prison staff contribute to these violations,[214] which are further exacerbated by natural disasters.[215]

- Incarcerated persons in Haiti are at substantial risk of violence from police, prison officials, and fellow detainees.[216] Advocates have documented beatings of individuals in custody by police officers;[217] rape and other forms of GBV against women;[218] and rape and physical and verbal assault of gay men by fellow detainees.[219] Children detained alongside adults are particularly vulnerable to abuse.[220] Victims of these abuses largely refrain from seeking recourse for fear of reprisals, and impunity is the norm.[221]

V. Lack of equal rights & protections

Haiti's worsening violence, humanitarian crisis, and deepening collapse of services continue to disproportionately impact individuals with marginalized identities: a product of their heightened vulnerabilities and insufficient government protections or accommodations. For example, those with vulnerabilities relating to disability or advanced age are less able to flee attacks, relocate, or seek assistance, and targeted attacks against marginalized groups like Haiti's rural farmers ("***peyizan***") and LGBTQI+[IV] persons persist – all without an effective government response. Women and girls – due to longstanding inequality and discrimination that restrict their educational and economic opportunities, enforce economic and social dependence on men, and normalize GBV – experience distinct barriers to securing their basic rights, and are therefore particularly impacted by the ongoing insecurity and socioeconomic breakdown.[222] They are the main targets of soaring sexual violence,[223] which armed groups continue to weaponize. Other forms of GBV likewise remain widespread. The response to GBV and other gendered inequities is inadequate, as reflected in ineffective protections, services, and accountability mechanisms for GBV survivors; insufficient and shrinking funding; and ongoing marginalization of women in leadership and decision-making.[224] The lack of political commitment, policy focus, and budgetary allocations for ensuring that women can fully participate in elections – including insufficient measures to prevent political violence and tackle structural gendered barriers – are emblematic and raise serious concerns about women's rights going forward, as well as Haiti's future more generally.[225] At the same time, Haiti's children continue to experience acute privations and violence, including rising recruitment by armed groups and unlawful targeting by security responses. Protections, services, and child-appropriate security and reintegration measures remain inadequate.

- GBV has continued to surge at "alarming" rates.[226] Over 7,000 cases, most of them sexual violence[227] were reported by the UN in the first eight months of 2026; 3,335 incidents were reported by 16 organizations from April to June – an average of 37 new cases per day just at those locations.[228] These numbers are almost certainly undercounts, because fear of retaliation, revictimization, and social exclusion – alongside limited services for victims and lack of trust in the justice system – result in chronic underreporting.[229]
- Much of the ongoing surge in GBV is attributable to armed groups,[230] which continue to weaponize sexual violence as a means of spreading terror, holding territory, demonstrating power, retaliating, and punishing any perceived opposition.[231] Rape by multiple perpetrators remains the most common reported form of GBV by armed groups.[232] Others include human trafficking, sexual exploitation, sexual slavery, and coerced romantic relationships.[233] The assaults are frequently accompanied by, or are an accompaniment to, killing, abduction and captivity, physical violence, the burning of homes, and the use of weapons. And they are regularly perpetrated in the presence of victims' children and family members – or videotaped,[234] compounding trauma. Nowhere and no one are safe: survivors range from the very young to the very old[235] and report attacks in their homes, on transport, in public places, and when they flee.[236] GBV also persists in other forms, such as political, psychological, economic, and domestic violence; childhood marriage, sexual exploitation and abuse (**SEA**[V]), and pressures towards survival sex; and harassment – increasingly in digital forums. GBV perpetrators are likewise varied: they include intimate partners, family members, community and church leaders, members of civilians "defense" groups, government officials, and international actors.[237] The harms of sexual violence extend well beyond the attacks themselves: survivors face debilitating and permanent physical impairments; sexually transmitted infections (**STIs**); acute stigma and social rejection; psychological trauma, substance abuse, and suicide; and economic burdens.[238] Because abortion remains illegal and dangerous,[239] women – and sometimes girls – are also forced into unwanted pregnancies and burdens of

[IV] Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, Intersex, and other sexual orientations and gender identities.

[V] Widely accepted definitions by the UN and others are as follows. **Sexual abuse** means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Any sexual activity with children (persons under the age of 18 years) constitutes sexual abuse. **Sexual exploitation** means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. It includes but is not limited to exchanging money, employment, goods or services for sex. This includes transactional sex regardless of the legal status of sex work in the country. It also includes any situation where sex is coerced or demanded by withholding or threatening to withhold goods or services or by blackmailing.

parenthood.[240] The omnipresence of GBV further restricts the ability of women and girls to enjoy public spaces, institutions, and transit, reducing their ability to pursue livelihoods and education, lead their communities, access essential services, and advocate for their needs – or forces them to take grave risks to do so.[241]

- Gendered impacts of the insecurity are particularly apparent in the context of displacement. Women and girls remain the majority of IDPs[242] and experience more acute related harms. For example, the lack of adequate security, lighting, and privacy increase opportunities for sexual violence and other attacks. At the same time, constrained or nonexistent access to healthcare, hygiene, livelihoods, and other basic needs disproportionately affects displaced women and girls and deepens vulnerabilities to coercion and harmful coping strategies like survival sex. Protections, assistance, and justice mechanisms are also especially inaccessible, leaving survivors without support while feeding impunity and thereby enabling further assaults and exploitation.[243] The failures of gender-sensitive protection are particularly evident in the disproportionate incidence of GBV among displaced women and girls: they continue to account for more than half of all reported cases of sexual violence,[244] including SEA, wherein sex is demanded in return for a place to stay or basic humanitarian needs, sometimes by IDP site managers.[245]
- While especially limited in situations of displacement, as well as in violence-affected urban neighborhoods and in rural areas,[246] women's access to core needs like food, healthcare, education, livelihoods, protection, and justice remains disproportionately constrained in general.[247] Dedicated funding was significantly eroded by foreign assistance cuts, with devastating consequences for the ability of local organizations to promote women's rights or deliver assistance,[248] even as they remain the primary – and often sole – service providers at grave personal risk.[249] The Haitian government has undertaken several responsive measures, but they are insufficient relative to need.[250] The resulting scarcity of services and resources is compounded by the gendered impacts of insecurity, related risks and costs of transportation, the cost of care, family responsibilities and loss of income – and, for survivors of GBV, fears of reprisals or stigma. As a result, desperately needed medical and psychological care, shelter, economic, and legal support are largely unattainable,[251] which also increases vulnerabilities to exploitation and harmful coping strategies.[252] For example, the negative impact on access to sexual and reproductive healthcare, including contraception and menstrual products, remains significant.[253] As a result, maternal mortality is desperately high[254] and GBV survivors are rarely able to access medical and prophylactic care in time to prevent unwanted conception, reduce the risks of STIs, and effectively treat physical impacts of the assaults.[255] Survivors of GBV likewise generally lack recourse to effective police and legal protections for the same reasons, compounded by unlawful insistence on medical certificates and other procedural hurdles, shortages of qualified medical examiners, burdensome or unauthorized fees, inadequate investigations, judicial dysfunction, institutionalized mistreatment of survivors and indifference to GBV, lack of legal representation, fear of reprisals, government pressure to settle with their assailants, and the improbability of suitable sanctions or damages.[256]
- Haiti remains one of the most dangerous countries in the world for children.[257] Child recruitment by armed groups is rising at an "alarming rate,"[258] forcing thousands of children to become both victims and perpetrators of grave human rights violations.[259] Other harms include killing, maiming, abductions, and beatings;[260] trafficking, exploitation, child labor, and sexual violence (especially for girls);[261] being used by armed groups as human shields;[262] displacement;[263] and denial of basic rights like food,[264] education,[265] and humanitarian access.[266] These in turn render children more vulnerable to recruitment.[267] Children are also extrajudicially executed and otherwise harmed by government and civilian "defense" forces. They are likewise killed in drone strikes and in crossfire during security operations.[268] These are harms that the UN SRSG for children and armed conflict suggests amount to violations of international law if they persist.[269] There are no known investigations into or accountability for these incidents.[270] Measures to address human rights violations against children in general,[271] or to incorporate age-appropriate and reintegration-oriented practices into the security response, likewise continue to fall woefully short of what is needed given the scale of harms and the special needs of victimized children,[272] and given the present limitations of the justice and detention system for minors in general.[273]
- Other marginalized groups – and especially individuals with multiple intersecting vulnerabilities – likewise continue to face discrimination, exclusion, and violence.[274] Lack of resourcing and public accommodation mean that individuals with special physical, mental, or health needs face added barriers to accessing services, fleeing violence, and navigating the added hardships of the present crisis like displacement. Discriminatory attitudes by public authorities and the general public can compound the challenges. Older persons[275] and people with disabilities[276] are notable examples. LGBTQI+ individuals

continue to experience discriminatory treatment and heightened risk of GBV, including from armed groups and police.[277] Legal and state protections remain largely absent.[278] The reporting period also saw a significant increase in armed group attacks on rural communities, with devastating impacts on *peyizan*, including mass killings and kidnappings, destruction and theft of property, and immense resulting disruptions to food production and livelihoods.[279] *Peyizan* nevertheless receive scant protection from state authorities and rural areas in general continue to have little access to services.[280]

VI. Collapse of economic & social rights

Haiti's social and economic landscape continues to deteriorate as it faces what the UN Secretary-General called "the worst humanitarian crisis in the Western Hemisphere."[281] Over half the population is facing acute food insecurity. Widespread closures of medical facilities and schools continue to fuel the collapse of the health and education sectors. Increasing poverty and climate impacts[282] – exacerbated by chronic under-funding of prevention and response plans[283] – compound the humanitarian crisis. These challenges are the predictable result of long-term under-investment and institutional dysfunction rooted in persistent foreign interference and extraction, as well as corruption and mismanagement by Haitian officials.[284] Sustainable solutions to Haiti's intersecting crises will require addressing these structural drivers, including through reparations for past foreign harms.[285]

Economy in decline

- Haiti's economy is in its eighth consecutive year of decline.[286] According to World Bank data, approximately half the population lives below the poverty line.[287] Inflation has exceeded 15% every year since 2019, and is 17% as of August 2026.[288] The economy contracted every year from 2019-2025, and is currently forecast to contract 1.5% by 2026. Many Haitians are unable to afford basic necessities: essential goods – particularly core food products, clothing, and cooking charcoal – are extremely expensive.[289] In contrast, the minimum wage remains low, with impacts felt across both the formal and informal employment sectors.[290] The consequences are not just extreme levels of privation, but also compounding of risks. For example, unaffordable public transportation forces people to walk long distances, increasing their exposure to violence.[291] As a result, poor or otherwise vulnerable Haitians are turning to harmful coping mechanisms – such as taking on debt or leaving school to help support their families – that further entrench the cycle of poverty.[292] The United States' recent cancellation of Temporary Protected Status (**TPS**) for Haitians is expected to significantly reduce remittances to Haiti – which represent 16% of Haiti's gross domestic product – depriving already desperate families.[293]
- Insecurity exacerbates the long-term structural drivers of Haiti's economic decline.[294] Armed groups continue to impoverish Haitians through professionalized extortion and "protection" schemes,[295] and an ever-expanding network of checkpoints where victims are forced to pay huge sums of money to pass.[296] In March 2026, the UN Panel of Experts reported that armed groups are increasingly targeting remittances, further impoverishing the Haitian families who rely on them.[297] More generally, the insecurity interacts with chronic infrastructure issues[298] to disrupt trade flows, increase transportation costs, and impact commercial activity and foreign trade, resulting in job losses, reduced access to goods, and higher prices.[299] Armed group clashes near Haiti's main fuel terminal have disrupted access to fuel,[300] while global price increases have made the cost of fuel skyrocket.[301] The consequences are especially impactful for informal vendors from low-income neighborhoods, who make up Haiti's economic backbone but receive little to no government support.[302] As a result of these challenges, areas that are less directly impacted by armed group violence acutely feel the economic and humanitarian impacts.[303]

Access to water, sanitation, and hygiene

- Access to drinking water, basic hygiene, and sanitation remains limited.[304] Approximately 4.6 million Haitians lack access to safe water,[305] disproportionately those living in rural areas[306] and displacement sites.[307] Some must pay to get any water at all, whether for drinking or other uses – a huge financial burden for already struggling families.[308] Safe water and sanitation gaps continue to aggravate the spread of cholera and other communicable diseases.[309] The UN's 2016 promise to improve Haiti's water, sanitation, and hygiene infrastructure as part of its plan to eliminate UN-introduced cholera remains unfulfilled, compounding structural challenges.[310] The wide-ranging impacts of lacking adequate access to drinking water go beyond just public health: they also affect agricultural production and, by extension, household food security and economic resilience.[311]

- Haiti's problems with access to water and sanitation are rooted in longstanding foreign extraction[312] and related government failures to build, maintain, and invest in infrastructure.[313] The problems are exacerbated by growing environmental difficulties.[314] Acute insecurity presents further challenges:[315] in some areas, armed groups have destroyed water systems, prevented the provision of drinking water to residents, and made going out to collect water extremely dangerous.[316]

Access to food

- Haiti remains in the midst of one of the worst hunger crises in its history,[317] with the World Food Program (**WFP**) and Food and Agriculture Organization (**FAO**) identifying it as a "hunger hotspot" for the third year running.[318] More than half the population (5.8 million and growing) are facing acute food insecurity,[319] and humanitarian organizations expect the hunger crisis to deepen.[320] Many households, particularly among IDPs,[321] are unable to meet their nutritional needs, with people forced to skip meals and reduce non-food expenditures.[322] Children under the age of five make up over one-fifth of all those experiencing acute hunger;[323] according to the Ministry of Public Health and Population, over 250,000 face acute malnutrition, with severe health and developmental consequences.[324] Of those, nearly 100,000 are expected to suffer from life-threatening severe acute malnutrition.[325]

- The food crisis is driven by insecurity and resulting scarcity, transportation challenges, and inflation.[326] Armed groups targeting agricultural infrastructure – alongside increased violence in Haiti's main agricultural areas – have killed farmers and forced them to abandon their land, destroyed crops, and stolen livestock, impeding food production.[327] Armed groups' ever-expanding control over key transportation routes further limits the distribution of any food that is produced, amplifying supply shortages.[328] On the consumer end, venturing out to purchase food also carries immense risk in areas where armed groups are active.[329] The deepening hunger crisis, alongside the lack of socio-economic opportunities, is a principal factor driving recruitment by armed groups, with children particularly at risk.[330]

- Persistent foreign interference with Haiti's food sovereignty, agricultural policy failures and neglect, and environmental challenges impacting food production are longer-term drivers of Haiti's protracted food crisis.[331] Continued reductions to already inadequate humanitarian food assistance compound these challenges.[332]

Access to healthcare

- Targeted attacks by armed groups against hospitals and healthcare workers,[333] alongside generalized insecurity, continue to impact hospital operations and force closures.[334] According to the latest UN reporting, just 10% of health facilities nationwide with inpatient capacity are fully operational.[335] Several major hospitals that closed in 2024 and 2025 due to armed group attacks remain inoperational.[336] Increased insecurity in Cité Soleil in May and June 2026 forced Médecins Sans Frontières (**MSF**) to suspend operations in its Cité Soleil hospital and the nearby Isaïe Jeanty Maternity Hospital for several weeks, leaving thousands of people without access to healthcare.[337] Prior to closing, both facilities also took in hundreds of people fleeing the violence.[338] As insecurity forces hospital closures, it also increases demand, leaving remaining healthcare facilities overwhelmed and patients at risk.[339] For example, doctors at the overwhelmed Hôpital Universitaire de La Paix – the only major public hospital in Port-au-Prince that is still operational, and the only one offering specialized care[340] – are forced to prioritize critical cases, with sometimes deadly consequences for others.[341]

- Even where hospitals are operational, insecurity impedes physical access for patients and healthcare workers[342] and generates acute shortages of medicine and critical supplies.[343] Frequent power outages and expensive fuel for generators compound these challenges.[344] The related increase in medication costs – on top of the closures of most large, public hospitals[345] – makes access to affordable healthcare virtually impossible for Haitians impacted by the economic crisis or living in rural areas.[346] Even where care is free, sometimes the cost and danger of transportation prevents access.[347] Chronic under-resourcing of Haiti's healthcare sector,[348] exacerbated by global cuts to foreign assistance,[349] is a longer-term driver of Haiti's health crisis. Persistent failures to pay hospital staff on time (in some cases, for nearly a year) and deteriorating working conditions have led to strikes and demonstrations by healthcare workers that further disrupt access to health.[350] The continued closure of the State University Hospital is preventing medical and nursing students from completing their training, contributing to staffing shortages.[351]

- Haiti's mental health crisis – the product of constant exposure to violence, loss of loved ones, surging displacement, and the desperate humanitarian situation – remains underdocumented and largely unaddressed.[352] Children and survivors of sexual violence are particularly impacted.[353] Haiti's two public mental health hospitals have been dysfunctional since 2024.[354] The barriers to accessing healthcare described above, exacerbated by chronic government failures to prioritize mental health, impede access to psychological care.[355] Providers and front-line workers themselves also continue to be affected psychologically, impacting their ability to help others.[356]
- Cholera, introduced to Haiti by UN peacekeepers' reckless disposal of human waste in 2010, reemerged in October 2022 and remains a significant threat.[357] The WHO reported 722 cases and 2 deaths between January and August 2026.[358] The spread of cholera is driven by longstanding failures in water, sanitation, and hygiene infrastructure, exacerbated by increased displacement in overcrowded and unsanitary conditions.[359] Insecurity and under-resourcing impede prevention and treatment.[360] These challenges also contribute to the increased prevalence of other communicable diseases, particularly diphtheria.[361]

Access to education

- Insecurity continues to restrict access to education.[362] Many schools remain inoperational, either because they have been destroyed or driven out by armed groups, or because they are being used as informal displacement sites by those fleeing the violence.[363] The Union of Progressive Haitian Parents of Students reported that as of August 2026, 1,700 schools remain closed across the country and an additional 500 have been destroyed, most in the West Department.[364] According to the UN's independent expert on human rights in Haiti, children in Haiti have not enjoyed a single uninterrupted year of schooling in the last eight years as a result of insecurity, displacement, and financial barriers, even in areas less directly impacted by armed group violence.[365]
- Even when schools remain open, attending is often not safe.[366] Many children are forced to cross areas controlled by armed groups to get to school, exposing them to crossfire, kidnapping, and forced recruitment.[367] Sixty percent of parents surveyed by the IRC in the West, Artibonite, and Center Departments reported keeping their children out of school to avoid violence.[368] The forced closure or relocation of many schools due to insecurity – alongside increased displacement of both teachers and students[369] – has affected the quality of education in institutions that remain open and exposes students and teachers to additional risks as they are forced to travel even greater distances to makeshift premises.[370]
- The government response to these acute education challenges remains inadequate and is rooted in chronic under-resourcing of the school system.[371] Poor children have always faced disproportionate barriers to accessing education due to the dearth of public institutions.[372] But increased economic hardship and insecurity-related difficulties are preventing more and more families from being able to pay to send their children to school.[373] Government failures to adequately equip schools, pay teachers – who often work at great personal risk – a timely and sufficient salary, and generally improve working conditions in line with previous commitments to teachers' unions compound the above-described challenges.[374]

VII. Emigration pressures

The number of pathways available for Haitians seeking safety away from the country's increasingly desperate circumstances continues to dwindle. Even as foreign governments publicly emphasize Haiti's worsening insecurity and humanitarian crisis, many are implementing ever more restrictive measures aimed at preventing migration, while escalating removals of Haitians from their territories. The U.S. government's cancellation of TPS for Haitians and the related surge in deportations are especially salient examples of this policy inconsistency.[375] The United States and the Dominican Republic, in particular, are also responsible for severe human rights abuses as they remove Haitians. Advocates and courts have found clear links to racial animus in these policies,[376] which are consistently criticized as being inhumane and, in many cases, illegal.[377]

- Countries are forcibly returning Haitians fleeing the above-described security and humanitarian collapse in ever greater numbers,[378] despite repeatedly acknowledging the severity of the crisis.[379] Nearly 200,000 Haitians were returned to Haiti between January and August 2026, a 10% increase from the same period in 2025.[380] The Dominican Republic remains responsible for around 99% of all removals – equivalent to over 700 per day.[381] Removals are accompanied by a myriad of human rights abuses,[382] including as

a result of inhumane pre-deportation detention conditions,[383] violence by immigration officials,[384] and family separation.[385] Dominican authorities continue to target Haitians seeking healthcare, particularly pregnant and postpartum women, for removal, with severe consequences for perinatal health.[386] These violations continue to be met with impunity.[387] Haitians' vulnerability in the face of the Dominican government's migration policies leaves them at risk of extortion by corrupt officials[388] and exploitation by employers, who use the threat of deportation to commit wage theft and other labor rights violations.[389]

- The number of deportations from the United States to Haiti and related rights violations has increased dramatically.[390] The increase is largely a result of the U.S. government's termination of TPS for Haitians,[391] which took effect on August 6, 2026 following a lengthy legal battle,[392] and put over 350,000 Haitians who until then had been living legally in the United States at immediate risk of detention and deportation.[393] U.S. officials terminated the program without the legally mandated consultations regarding country conditions,[394] and despite consistent warnings from the U.S. State Department urging U.S. citizens not to travel to Haiti for any reason,[395] as well as newly issued guidance advising those who do travel there to leave behind DNA samples and dental records in order to help identify their remains.[396] The U.S. government continues to curtail other forms of relief for Haitians seeking safety as well, including asylum and refugee resettlement.[397] These policies cut off critical avenues of protection for Haitians, including former TPS holders,[398] and have the effect of excluding the most vulnerable.[399] They are also enabling increased immigration enforcement actions against Haitians, with U.S. Immigration and Customs Enforcement (**ICE**) agents arresting Haitians *en masse* and without regard to legal status.[400] Haitians targeted for removal are subject to serious rights abuses, including unjustified and humiliating surveillance using ankle monitors;[401] inhumane, prolonged, and sometimes incommunicado detention in inhumane conditions in for-profit facilities;[402] and due process violations.[403] Among those deported are individuals with medical issues and young children, including some who are U.S. citizens and at least one newborn.[404] The use of shackles on Haitians during deportation flights[405] and the policy of deporting children and other vulnerable individuals alongside those with criminal convictions – including for sex crimes involving minors – constitute further violations of Haitians' dignity and safety.[406]

- Haitian migrants who are returned to Haiti (**returnees**) are distinctly vulnerable to Haiti's intersecting crises.[407] Many arrive alone[408] with few resources,[409] urgent humanitarian needs, and deep traumas from abuses during deportation proceedings.[410] Some of those deported from the United States report having had passports, money, and other valuables confiscated and never returned to them.[411] Returnees face difficulty finding employment and often lack the social safety networks critical to survival – some have never even been to Haiti.[412] They are at increased risk of murder, kidnapping, and extortion because they are perceived as having money or standing in opposition to armed groups.[413] According to the IOM, over half of those returned in the last three years have been deported multiple times, compounding vulnerabilities.[414]

- Haiti's National Office of Migration (**ONM**) is responsible for processing returnees, but lacks capacity to adequately receive them and has failed to establish a comprehensive plan for their reintegration.[415] The manner in which ONM processes returnees exposes them to additional rights violations, including lack of access to medical care and detention in an overcrowded "reception center," which observers say is just a container with one working toilet per 60 people and no running water.[416] Returnees with prior criminal convictions are processed last and therefore routinely held overnight in one overcrowded cell – men and women together – without food, water, or access to a toilet.[417] Any immediate support provided by the ONM is grossly inadequate, and promises to provide longer-term support such as overnight stays, medical and psychological care, and onward transportation remain unfulfilled.[418] Humanitarian assistance by non-governmental organizations is likewise insufficient, including because of continued foreign funding cuts.[419] U.S. failures to provide timely and accurate information about incoming flights – including the number of returnees on any given flight, their protection needs, and any criminal records – compound these capacity challenges.[420]

- The lack of adequate support for returnees increases their exposure to violence and humanitarian challenges. Because the Port-au-Prince airport is closed to flights from the United States, U.S. deportation flights land in Cap-Haïtien (a city in the North Department).[421] This forces many returnees to travel long distances along treacherous – and often deadly – routes controlled by armed groups if they want to be reunited with their communities,[422] and underscores the hypocrisy and cruelty of continued deportations.[423] Returnees traveling to other parts of the country are also at increased risk of violence from civilian-led "defense" groups, which often target people on the basis of social factors, such as the clothes they wear or tattoos.[424] Deportation flight delays, combined with onerous ONM processing,

mean that sometimes returnees are forced to travel at night, which is particularly risky.[425] Haitians removed from the Dominican Republic to border towns face similar challenges.[426] Many returnees have no home to return to at all because armed groups have destroyed their neighborhoods,[427] leaving them to join the hundreds of thousands of Haitians living in precarious, overcrowded, and unsafe displacement sites[428] or to find shelter with host families – a difficult task for returnees who lack funds and social connections. Cap-Haïtien itself – although not under the control of armed groups – is not equipped to handle the influx of returnees. The city's population has tripled in two years from deportees and people fleeing violence elsewhere.[429] The influx has intensified the pressure on already weak local resources and infrastructure.[430] Piped water remains severely limited, and electricity from the government's electric company has been effectively unavailable since 2021.[431] Experts say the huge number of returns will make Haiti's devastating humanitarian crisis even worse, contributing to a mutually reinforcing cycle of displacement and deportations.[432]

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

Even as Haiti's crisis grows worse, the international response has remained materially unchanged and ineffective. On balance, the response continues to prioritize military solutions to the exclusion of critical elements of the crisis like governance, corruption, and human rights.[433] The new GSF has had six more months since the last Update, but the security situation remains materially unchanged. The international community has applied intense focus on the holding of elections, without a clear contemplation of international human rights standards and best practices – especially around inclusion, fairness, and credibility. This focus has continued, even as it has been clear that elections would not be possible this year and would, in any foreseeable circumstances, disenfranchise a huge number of Haitians.[434] At the same time, humanitarian assistance remains grossly underfunded relative to need, illegal weapons continue to flow into Haiti, and a surge in deportations risks further destabilizing Haiti's weak economy (in addition to generating serious human rights violations).[435]

- The conversion of the MSS into the more militarized and independent "Gang Suppression Force" in September 2025 was a tacit acknowledgment of the MSS failure to materially improve the security situation and the need for a different approach.[436] Yet the GSF itself is not showing to be a success,[437] as demonstrated by its inability to prevent or respond to the recent massacres in Kenscoff.[438] The force has faced many of the same challenges as the MSS, notably significant delays in recruiting and deploying troops and equipment.[439] A year after its authorization, the GSF reportedly has approximately 1,500 of the proposed 5,500 personnel deployed.[440] Even the 5,500 number falls far short of the the 30,000 security personnel that U.S. planners estimate would be necessary to secure the country.[441] GSF leadership has made clear that the force is not getting the support it needs to fulfil its limited mandate, both in terms of resources and time. For example, the GSF Special Representative has stated that the force requires two years to achieve its objectives, but the force's mandate was renewed for just six months on September 30, 2026.[442] Longstanding concerns about compliance and accountability of foreign troop deployments[443] have also been validated. The UN received multiple allegations of SEA committed by MSS personnel, with four cases against girsl aged 12, 16, 16, and 18 substantiated by the Office of the UN High Commissioner for Human Rights (**OHCHR**), but subsequently dismissed by MSS and Kenyan authorities based on inadequate investigations and with no compensation to the survivors.[444] The GSF faces the same challenges as the MSS in terms of prevention and accountability, but has not articulated a comprehensive operational structure for ensuring these objectives as of writing.[445] This is particularly concerning given the GSF's more robust mandate, which offers greater opportunities for abuse;[446] formalized cooperation between GSF leadership and private security companies operating in Haiti;[447] and the deployment of Sri Lankan troops, despite Sri Lanka's history of shielding perpetrators of abuse, including the refusal to ensure criminal accountability for the 134 Sri Lankan peacekeepers who were involved in systematic SEA againt Haitian children under the previous UN Stabilization Mission in Haiti.[448]
- High-volume arms trafficking from outside Haiti – which produces no weapons or ammunitions of its own and has been subject to an arms embargo since 2023 – remains a significant driver of insecurity.[449] Most weapons continue to come from the United States.[450] U.S. government efforts to address arms trafficking to Haiti[451] have been insufficient to stem the flow of weapons.[452] Insecurity, capacity constraints, and widespread corruption continue to impede efforts by Haitian authorities to intercept arms shipments and prosecute perpetrators.[453]

- International actors have continued to issue sanctions against Haitian individuals accused of corruption or collusion with armed groups,[454] several of which remain under U.S. terrorism designations.[455] However, the sanctions' impact on armed groups remains negligible, including because the Haitian and foreign governments have persistently failed to effectively and timely implement them.[456] Some international actors have also failed to sanction the political and economic figures directly responsible for Haiti's crisis.[457] In a particularly striking example, former President, PHTK founder, and Miami resident Michel Martelly, who is subject to both U.S. and Canadian sanctions, returned to Haiti in July 2026 and has since registered his candidacy in the upcoming election; there appear to be no efforts to implement the sanctions against him on the Haitian side.[458]
- Humanitarian assistance to Haiti remains critically under-resourced, even as needs continue to surge.[459] As of writing, the humanitarian aid basket for Haiti is less than half-funded.[460] The resulting disruptions to aid operations – especially with respect to nutrition assistance and programs for women and children – have disastrous humanitarian, security, and economic consequences[461] and are damaging the population's trust in humanitarian actors.[462] The rising insecurity continues to complicate aid delivery and endanger staff, and has forced some aid organizations to cease operations entirely in certain areas.[463] Moreover, the scale of armed groups' territorial reach means that humanitarian actors often have to negotiate directly with criminal groups in order to deliver aid, particularly in the insecure areas where humanitarian assistance is most needed.[464] These acute challenges are happening within the broader context of longstanding harmful aid practices that continue to impede Haiti's development, even as they purport to help.[465]

Notes

[1] *See* International Committee of the Red Cross (**ICRC**), *Haiti: Everything must be done to protect the population from escalating gang violence* (Aug. 19, 2026), https://www.icrc.org/en/article/haiti-do-everything-possible-protect-population-effects-escalating-armed-violence ("Growing insecurity is only part of it: the very fabric of people's daily life is unravelling. The mounting consequences of violence, including repeated displacement, limited access to health care and dwindling livelihoods, hit the most vulnerable hardest.").

[2] *See* IJDH, *Human Rights Update – March 2026*, pp. 1-2, 11 (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf; Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees ("It is indisputable that a new international strategy toward Haiti is needed, but the Trump administration is effectively reimagining the approach to the country's security through a set of tangled objectives: cutting aid to Haiti, deporting Haitians back to it, and pushing forward on a military intervention to stabilize it.").

[3] Romain Le Cour Grandmaison, *Why a security approach alone isn't enough to rid Haiti of gangs*, The New Humanitarian (Apr. 29, 2026), https://www.thenewhumanitarian.org/opinion/2026/04/29/why-security-approach-alone-isnt-enough-rid-haiti-gangs; Sophie Rutenbar, *Another gang suppression force may win battles yet lose Haiti's deeper war*, Miami Herald (Apr. 6, 2026), https://www.miamiherald.com/opinion/op-ed/article315290165.html ("[A] security-focused approach will not be enough to establish peace in Haiti. . . . [T]he problem with past U.S.-led and UN interventions — and the reason the situation now demands another intervention — is that previous efforts didn't do enough to address the situation's criminal, political and economic roots."); Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees ("The U.S. government is pushing an aggressive counter-gang offensive within Haiti itself. . . . Missing from the strategy, however, is a humanitarian surge to match."); Harvard Law School International Human Rights Clinic, *The New Humanitarian Actors: Politicization, Corporization, & Militarization in the Aid Sector*, pp. 10-11 (Jun. 2026), https://humanrightsclinic.law.harvard.edu/wp-content/uploads/2026/06/New-Humanitarian-Actors-Politicization-Corporatization-Militarization-in-the-Aid-Sector-060326.2.pdf ("Haiti has long been the site of fraught foreign intervention, underscoring the need for humanitarian assistance rooted in a [Human Rights–Based Approach] . . . that centers Haitian stakeholders. Instead, Haiti has become a testing ground for new, security-driven models of intervention. . . . Collectively, these developments signal a move away from international crisis response rooted in neutral, multilateral institutions anchored in human rights values and humanitarian principles, toward a security-first architecture in which coercive capacity is the measure of success. Even if these actors are effective at improving security over the short term, they risk crowding out international engagement focused on strengthening rights over the long term."); *see also* Section VIII.

[4] *See* Section II.

[5] *See* Sections II and III.

[6] *See* UN, *OHCHR/Türk Haiti* (Oct. 2, 2026), https://media.un.org/unifeed/en/asset/d363/d3638971 ("Free and fair elections are the only legitimate way to restore constitutional order. However, given all I have just described, it is difficult to conceive that the conditions for credible elections later this year are in place. Those responsible for serious human rights violations and abuses must not be allowed to enter the race."); IJDH, *Human Rights Update – March 2026*, note 17 (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf.

[7] *See* note 436.

[8] *See* Section VIII.

[9] *See* notes 437-442. In posts on X in the month after the attack, the GSF said it was taking over certain patrol positions from the Haitian National Police (**PNH**) in Port-au-Prince, with the aim of freeing up police units to redeploy "to support operations in #Kenscoff." X, Gan Suppression Force – Haiti, @GSForceHaiti (Sep. 1, 2026), https://x.com/GSForceHaiti/status/2094964616937849083; X, Gan Suppression Force – Haiti, @GSForceHaiti (Aug. 31, 2026), https://x.com/GSForceHaiti/status/2094529959050035393; *see also* Global Initiative Against Transnational Organized Crime (**GI-TOC**), *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ ("[T]he latest GSF strategic plan, presented in July, did not identify Kenscoff as a deployment site.").

[10] *See* note 440.

[11] *See* note 442.

[12] *See* notes 120-125, 151.

[13] *See* Section II (*Government failure to protect civilians, including human rights defenders and journalists*).

[14] *See* Section II.

[15] *See* notes 105-113, 138-148.

[16] *See* note 115.

[17] *See* note 119.

[18] *See* Section II.

[19] *See* notes 48, 327.

[20] GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/.

[21] *See* Section III.

[22] There is an articulared roadmap for key transitional elements that reflect extensive consultations with civil society and negotiated decisions, however flawed. It is articulated in the April 3, 2024 Political Accord for a Peaceful and Orderly Transition signed by the Transitional Presidential Council (**TPC**) and containts the following elements: (i) an independent electoral council chosen by a broad spectrum of Haitian society; (ii) a national security council responsible for defining and supervising any international security assistance; (iii) a Truth, Justice, and Reparations Commission; and (iv) an oversight body. At the time the TPC's mandate expired on February 7, 2026, and U.S. pressure consolidated power in Fils-Aimé – who had been the transitional Prime Minister for over a year and therefore shared the TPC's poor security and governance record – these benchmarks were largely unmet. *See* IJDH, *Human Rights Update – March 2026*, p. 1 (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf; IJDH, *Human Rights Update – June 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. These elements were [not] explicitly included in the Pact that validated the February 2026 transition towards one-man-rule by Fils-Aimé, but offer a benchmark defined through a heavily negotiated process against which transitional government policies might be measured.

[23] "[T]he implementation of the Pact – particularly regarding the provisions on the restoration of security – remains very slow, further weakening domestic confidence in the transition." UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 16, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714.

[24] In December 2025, the government adopted two decrees, one "Regulating the Exercise of Freedom of Expression and Providing for the Prevention and Punishment of Defamation and Press Offenses" and the other establishing the organization and function of the High Court of Justice. The former imposes restrictions on freedom of expression that "could unduly restrict freedom of expression and criminalize criticism of public officials," according to the Special Rapporteur for Freedom of Expression of the Inter-American Commission on Human Rights (**IACHR**). The latter was "passed with the same purpose in mind: [t]o shut everyone up," according to Haitian human rights attorney Rosy Auguste Ducéna. IJDH, *Human Rights Update – March 2026*, note 127 (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf (citing sources); Le Moniteur, *Décret Portant Organisation et Fonctionnement de la Haute Cour de Justice* (Dec. 17, 2025), https://ecc-haiti.org/768-2/; Le Moniteur, *Décret Encadrant l'Exercice de la Liberté d'Expression et Portant Prévention et Répression des Délits de Diffamation et de Presse* (Dec. 18, 2025), https://www.haitilibre.com/docs/Decret-la-liberte-dexpression-repression-des-delits-de-diffamation-et-de-presse.pdf; *see also* UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 40, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 (the UN Panel of Experts expressed concern that the adoption of these two decrees undermines the principles of "[t]he rule of law and the effective protection of human rights"); Haitien Direct, *Le RNDDH appelle à l'abrogation du décret controversé sur la liberté d'expression* (Sep. 12, 2026), https://haitien-direct.com/2026/09/12/le-rnddh-appelle-a-labrogation-du-decret-controverse-sur-la-liberte-dexpression/ (during a meeting of journalists, human rights defenders, and civil society representatives to address concerns about the decree regulating the exercise of freedom of expression, the head of *Groupe Médialternatif*, a Haitian association of media professionals, "warned of the decree's impact on the media, civil society, and whistleblowers, in a context already marked by threats and self-censorship," and said it "could encourage a culture of silence and excessive criminalization of freedom of expression") (*internal quotations omitted*); Marvel Dandin, *Silencing Haiti's journalists*, AJWS, https://ajws.org/stories/silencing-haitis-journalists/ (last visited Oct. 19, 2026) (the decree concerning freedom of expression is "devastating," because "[w]ith courts and administrative oversight systems barely functional, the investigations of journalists and human rights organizations have been a rare mechanism to expose wrongdoing"); note 134.

[25] *See* note 134.

[26] The Prime Minister and Provisional Electoral Council (**CEP**) – the independent body responsible for running elections – adopted a revised electoral decree on June 2, 2026 (*see also* note 31); it has been amended several times since. Le Moniteur, *Décret Électoral* (Jun. 2, 2026), https://cephaiti.ht/wp-content/uploads/2026/07/decret-electoral-.pdf; Le Moniteur, *Décret Modifiant le Décret Électoral du 2 Juin 2026* (Jul. 2, 2026), https://cephaiti.ht/wp-content/uploads/2026/10/Special-N-34-DECRET-MODIFIANT-LE-DA_CRET-A_LECTORAL-DU-2-JUIN-2026.pdf; Le Moniteur, *Decree Amending the Electoral Decree of June 2, 2026, As Amended by the Decree Of July 2, 2026* (Oct. 6, 2026), https://cephaiti.ht/wp-content/uploads/2026/10/DECRET-DU-6-OCTOBRE-2026-REVISANT-LE-DECRET-ELECTORAL-DU-2-JUIN-2026-MODIFIE-PAR-CELUI-DU-2-JUILLET-2026.pdf. In July, they agreed on an electoral budget of $120 million and published the electoral calendar, which set December 13, 2026 as the date for the first round of elections. Robenson Geffrard, *CEP and Government Reach Agreement on $120 Million Electoral Budget*, Le Nouvelliste (Jul. 3, 2026), https://lenouvelliste.com/en/article/269389/cep-and-government-reach-agreement-on-120-million-electoral-budget; CEP, *Publication Officielle du Calendrier Electoral 2026-2027* (Jul. 27, 2026), https://cephaiti.ht/wp-content/uploads/2026/07/NOTE-CALENDRIER-ELECTORAL.pdf. They set and then pushed back candidate registration timelines several times. *See* CEP, *Publication Officielle du Calendrier Electoral 2026-2027* (Jul. 27, 2026), https://cephaiti.ht/wp-content/uploads/2026/07/NOTE-CALENDRIER-ELECTORAL.pdf (setting the registration period from August 20 to October 2, 2026); CEP, *Prolongation de la Période D'inscription des Candidats* (Sept. 2, 2026), https://cephaiti.ht/wp-content/uploads/2026/09/NOTE-56-PROLONGATION-INSCRIPTION.pdf (extending the period through October 14); CEP, *Note de Presse* (Sept. 19, 2026), https://cephaiti.ht/note-de-presse-60-16-septembre-2026/ (extending the deadline for online registration from September 20 to October 9); CEP, *Prolongation de la Période D'inscription en Ligne des Candidats et Ajustement de Certaines Échéances du Processus Électoral* (Oct. 5, 2026), https://cephaiti.ht/prolongation-de-la-periode-dinscription-en-ligne-des-candidats-et-ajustement-de-certaines-echeances-du-processus-electoral/ (extending the period through October 31). On October 6 (after the reporting period for this Update), the CEP announced that elections would be postponed indefinitely due to technical and operational difficulties. France24, *Haiti postpones elections indefinitely amid gang violence* (Oct. 10, 2026), https://www.france24.com/en/americas/20261007-haiti-postpones-elections-indefinitely-as-gang-violence-hampers-preparations.

[27] *See, e.g.*, UN, *OHCHR/Türk Haiti* (Oct. 2, 2026), https://media.un.org/unifeed/en/asset/d363/d3638971; https://www.nytimes.com/2026/09/03/world/americas/haiti-election-gangs.html; Edxon Francisque, *Haiti's Northeast residents register to vote as election hopes meet security concerns*, Haitian Times (Aug. 25, 2026), https://haitiantimes.com/2026/08/25/haitis-northeast-residents-register-to-vote-as-election-hopes-meet-security-concerns/.

[28] Kervenson Marial & Fritznel D. Octave, *Under 7% of Haiti voters registered 4 weeks before process ends for December elections*, Haitian Times (Sep. 10, 2026), https://haitiantimes.com/2026/09/10/haitis-low-voter-registration-rate-underscores-participation-challenge-for-upcoming-vote/.

[29] Discussions around elections have lacked a focus on inclusion of historically marginalized majorities, especially women and poor people, as candidates or voters. *See* note 225.

[30] Edxon Francisque, *Haiti's Northeast residents register to vote as election hopes meet security concerns*, Haitian Times (Aug. 25, 2026), https://haitiantimes.com/2026/08/25/haitis-northeast-residents-register-to-vote-as-election-hopes-meet-security-concerns/.

[31] "Haiti's de facto Prime Minister Alix Didier Fils-Aimé published a long-awaited electoral decree this week [in June], but the country's Provisional Electoral Council (CEP) . . . says the published text is 'totally different' from what it submitted to the executive in April, calling the move unconstitutional and a power grab. . . . Critics say the modified decree creates a government-appointed Director General position within the CEP that has no basis in the council's organizational structure, effectively giving the executive branch control over the electoral process ahead of elections promised by December 2026." X, Drop Site, @DropSiteNews (Jun. 4, 2026), https://x.com/DropSiteNews/status/2062408834828677415.

[32] Jacqueline Charles, *Haiti revises electoral law again, but doesn't formally postpone Dec. 13 vote*, Miami Herald (Oct. 9, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317549168.html; Dánica Coto, *Haiti's electoral council drops rule targeting candidates sanctioned by foreign countries*, Associated Press (Oct. 9, 2026), https://apnews.com/article/haiti-elections-sanctions-cep-bank-brh-f230a464fd7abd0addfd560152da11b5.

Individuals subject to UN sanctions are still barred from running, but the impact is minimal – only nine individuals are subject to UN sanctions, and seven of those are armed group leaders. Several candidates subject to non-UN sanctions have already registered their candidacy. CEP, *Statistiques d'enregistrement des candidats*, https://cephaiti.ht/statistiques-enregistrement-des-candidats/ (last visited Oct. 19, 2026) (among the registered presidential candidates as of Oct. 19 are Gary Bodeau, sanctioned by the U.S., Canadian, and Dominican governments for corruption; Claude Joseph, sanctioned by the Dominican government; Michel Martelly, sanctioned by the U.S., Canadian, and EU governments for financing armed groups and drug trafficking; and Jocelerme Privert, sanctioned by the Canadian government for gross and systemic human rights violations); notes 44-46; *see also* Juhakenson Blaise, *OAS urges Haiti to bar candidates tied to criminal groups as filings open*, Haitian Times (Sep. 15, 2026), https://haitiantimes.com/2026/09/15/oas-urges-haiti-bar-candidates-criminal-ties/ ("That distinction is significant. An allegation that a candidate has ties to a criminal organization is not necessarily the same as being formally designated under the U.N. sanctions regime, as the electoral decree puts it.").

[33] Haiti Libre, *Haïti - FLASH : Une certaine «collusion» entre politiciens et gangs, menace les élections en Haïti* (Sep. 11, 2026), https://www.haitilibre.org/article-48416-haiti-flash-une-certaine-collusion-entre-politiciens-et-gangs-menace-les-elections-en-haiti.html ("[T]he Secretary General of the Organization of American States (OAS), denounced the existence of a certain collusion between politicians and armed gangs in Haiti and warned that these links could compromise the credibility of the upcoming elections. . . . The Secretary-General, who visited Haiti in August, explained that he had raised with the authorities the need to establish clear rules to prevent candidates linked to criminal organizations from running in elections, while stating that he had not received any clear response on this matter.") (*internal quotations omitted*); *see also* Section III.

[34] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714.

[35] *See* note 151.

[36] *See* notes 449-453.

[37] IJDH, *Why #StopTheProp: Nothing in Haiti Will Change Until the U.S. Government Stops Propping Up Haiti's Corrupt, Repressive, Illegitimate De Facto Government*, https://www.ijdh.org/press_release/why-stoptheprop-nothing-in-haiti-will-change-until-the-u-s-government-stops-propping-up-haitis-corrupt-repressive-illegitimate-de-facto-government/ (last visited Oct. 21, 2026).

[38] *See, e.g.*, X, Albert R. Ramdin - OAS Secretary General, @SG_OEA_OAS (Jul. 28, 2026), https://x.com/SG_OEA_OAS/status/2082093565715284114?s=20 (the Secretary General of the Organization of American States endorsed the electoral calendar in July); UN, *ECOSOC Ad Hoc Advisory Group on Haiti Ministerial-Level Meeting*, at 1:13:52 (Sep. 24, 2026), https://transcripts.un.org/en/asset/k1e/k1e2zmh16x?t=1:13:52 (the Caribbean Community endorsed the electoral decree setting December 13 as the election date); *see also* Centre de recherce et d'analyze de terrain (**CRAT**), *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, p. 33 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 ("[F]oreign political intervention has allowed Haitian political leaders to ignore the population in favor of outside support. . . . [I]nternational support structures created incentives for governance evasion rather than performance."); IJDH, *Human Rights Update – March 2026*, p. 1 (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf (discussing U.S. support for Fils-Aimé despite his "poor security and governance record").

[39] X, Drop Site, @DropSiteNews (Jun. 4, 2026), https://x.com/DropSiteNews/status/2062408834828677415.

[40] *See* Sections VII and VIII.

[41] *See* notes 267, 330.

[42] *See* note 272.

[43] *See* Kervenson Marial & Fritznel D. Octave, *Under 7% of Haiti voters registered 4 weeks before process ends for December elections*, Haitian Times (Sep. 10, 2026), https://haitiantimes.com/2026/09/10/haitis-low-voter-registration-rate-underscores-participation-challenge-for-upcoming-vote/ (extremely low voter registration numbers reflect the "dual challenge . . . [of] completing the technical work required to organize the vote while persuading millions of people who have lived through years of political instability and failed electoral timetables that participating is worthwhile").

[44] *See* notes 146-148, 152. For over a decade, individuals associated with the PHTK deliberately dismantled Haiti's democratic institutions, corrupted its accountability mechanisms, and built up gangs as instruments of political violence. IJDH, *Human Rights Update – June 2023*, pp. 13, 16, 20, 120-121 (Jun. 2023), https://www.ijdh.org/wp-content/uploads/2023/08/HRU-June-2023-FINAL_updated-8.14.pdf.

[45] Jacqueline Charles & Shirsho Dasgupta, *Amid looming election questions, silence on TPS, Haiti hires Trump operative to lobby*, Miami Herald (Sep. 22, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317336729.html ("In a statement Sunday, the Coalition des Forces Républicaines, which claims to represent 44 political parties and groupings. . . . accused the prime minister of launching his own political platform, a decision it says that "undermines the confidence of political actors and civil society" in the electoral process. "By having at his disposal the machinery of the state and all of the government ministries, he becomes a formidable adversary to other political groups participating in the electoral process," the group said. They accused the prime minister of violating the National Pact for Stability and the Organization of Elections, which he signed with political parties when he took full control of the government in May. The political platform Viktwa, or Victory, was created by individuals close to the prime minister, including one of his chief confidantes, Wilner Joseph, who unsuccessfully ran in the 2015-16 election to represent Port-au-Prince in the lower Chamber of Deputies and received less than 900 votes. . . . Fils-Aimé . . . has not publicly addressed concerns raised by political parties about whether he supports Joseph's candidacy.").

[46] Fritznel D. Octave, *Muscadin, controversial prosecutor facing UN allegations, puts in bid for Haiti's presidency*, Haitian Times (Sep. 30, 2026), https://haitiantimes.com/2026/09/30/muscadin-puts-in-his-bid-for-haiti-presidency/.

[47] *See* Pierre-Richard Luxama, Dánica Coto & Evens Sanon, *More than 50 kidnapped as violent gang attack in Haiti leaves 47 dead*, Associated Press (Aug. 25, 2026), https://apnews.com/article/haiti-kenscoff-gangs-killed-kidnapped-attack-1690b1523421eb72aa260d9d56b5d521 (an armed group attack on Kenscoff in August "pierced the belief that security in the troubled Caribbean country was improving"); ICRC, *Haiti: Everything must be done to protect the population from escalating gang violence* (Aug. 19, 2026), https://www.icrc.org/en/article/haiti-do-everything-possible-protect-population-effects-escalating-armed-violence ("'Areas that just yesterday we still considered safe are now becoming unsafe. There is nowhere left for people to take shelter,' said Marisela Silva Chau, ICRC Head of Delegation in Haiti.").

[48] *See generally* GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ (discussing the ways in which "gang violence has increasingly become rural and centrifugal, extending far beyond the capital"); *see also* Office of the UN High Commissioner for Human Rights (**OHCHR**), *High Commissioner Türk: We need all eyes on Haiti* (Oct. 2, 2026), https://www.ohchr.org/en/statements-and-speeches/2026/10/high-commissioner-turk-we-need-all-eyes-haiti ("Despite some success in containing their activity in parts of the capital, Port-au-Prince, gangs continue to adapt and expand, re-emerging in new areas and constantly rearming."); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 38, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("[G]ang attacks in Seguin, South-East Department, have marked a significant development in what had heretofore been a relatively safe region."); Reuters, *Haiti gang retaliation leaves at least 11 dead after security operation* (Sep. 28, 2026), https://www.reuters.com/world/americas/haiti-gang-retaliation-leaves-least-11-dead-after-security-operation-2026-09-29/; BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 11 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (noting "a pattern of territorial expansion"); María Fernanda Arocha, *Haiti's Kenscoff remains the target of deadly attacks. Why does this continue to happen?*, ACLED (Aug. 25, 2026), https://acleddata.com/expert-comment/haitis-kenscoff-remains-target-deadly-attacks-why-does-continue-happen ("While security forces have concentrated their efforts on operations aimed at regaining control in the central areas of Port-au-Prince, criminal groups have instead sought to expand into rural communities that are vulnerable due to the limited response capacity of the police, but which remain strategic hubs to control resources or access routes around the capital and other cities."); Food and Agriculture Organization of the UN (**FAO**) & World Food Programme (**WFP**), *Hunger Hotspots: FAO–WFP early warnings on acute food insecurity, June to November 2026 outlook*, p. 5 (2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/; Harriet Barber, *'It was a massacre': Haiti gangs carry out mass killings across the country*, The Guardian (Jul. 2, 2026), https://www.theguardian.com/global-development/2026/jul/02/it-was-a-massacre-haiti-gangs-carry-out-mass-killings-across-the-country (armed groups, "seeking to extend their reach, . . . are pushing into Haiti's rural heartland, which was once largely insulated from the violence, attacking farming communities, seizing key roads and massacring entire villages;" they "are now present in five out of 10 of Haiti's departments") (*internal quotations omitted*); Famine Early Warning Systems Network (**FEWS**), *Haiti - Food Security Outlook Update*, p. 2 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print.

[49] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 20, 38, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("After years of instability and given the absence of effective governing structures, gangs have continued to fill the governance void in parts of the West, Artibonite and Centre Departments, while trying to extend their influence in other departments."); UN Population Fund (**UNFPA**), *Situation Report: Haiti: Displacement from escalation in gang violence, 1 July–31 August 2026*, pp. 1-2 (Sep. 2026), https://www.unfpa.org/sites/default/files/resource-pdf/Situation%20Report_Haiti_Jul-Aug%202026.pdf (noting "[e]scalating

gang violence" in Port-au-Prince and the Artibonite Departments, with the municipalities of Dessalines, Saint-Marc, Petite-Rivière, Cité Soleil, and Kenscoff the most affected); Alterpresse, *Haïti-Artibonite-Violences : Plus d'une centaine de victimes en un mois et demi, l'action de la Frg toujours attendue* (Sep. 18, 2026), https://www.alterpresse.org/Haiti-Artibonite-Violence-Plus-d-une-centaine-de-victimes-en-un-mois-et-demi-l-action-de-la-FRG-toujours-attendue (describing the deteriorating security situation in the Artibonite, with the communes of Petite-Rivière-de-l'Artibonite, Saint-Marc, Verrettes, Saint-Michel-de-l'Attalaye, Dessalines, L'Estère, Liancourt, and Gros-Morne particularly affected); Rhinews, *Saint-Michel-de-l'Attalaye : une attaque armée à Marmont fait au moins un mort et trois blessés par balles…* (Sep. 16, 2026), https://www.rhinews.com/actualites/saint-michel-de-lattalaye-une-attaque-armee-a-marmont-fait-au-moins-un-mort-et-trois-blesses-par-balles/ (describing repeated attacks by armed groups in Marmont in the Artibonite Department, "where the Gran Grif gang exerts significant control or influence over several areas"); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 20, 34, 70-71, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (armed groups retain control over about 70% of the Port-au-Prince metropolitan area, while "[t]he lower Artibonite has experienced an unprecedented level of coordinated gang violence since late March 2026"); Rezo Nòdwès, *Haïti | Chaos — Arcahaie sous pression des gangs, Cabaret toujours sous leur plein contrôle* (Aug. 26, 2026), https://rezonodwes.com/2026/08/haiti-chaos-arcahaie-sous-pression-des-gangs-cabaret-toujours-sous-leur-plein-controle/ (noting that Cabaret, in the West Department, "remains largely under the control of armed groups"); BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, pp. 5-6, 10-13 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (78% of armed group violence between April and June 2026 took place in the Port-au-Prince metropolitan area, 17% in the Artibonite Department, and 2% each in the Centre and South-East Departments); FEWS, *Haiti - Food Security Outlook Update*, p. 2 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print ("Recent attacks confirm a worsening of violence, particularly in Centre and Artibonite."); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 13, 27, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 (describing armed groups' continued control over Mirebalais and Saut-d'Eau in the Center Department, and their control over "large swathes of the West, Centre and Artibonite Departments, where they hold neighbourhoods, key economic corridors and agricultural regions"); *see generally* BINUH, *Flash Report: Haiti—Gang Violence: 613 Killed and 375 Injured in the Plaine du Cul-de-Sac and Cité Soleil Between March and July 2026* (Aug. 6, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Flash%20Report%20-%20Intensification%20of%20Gang%20Violence%20in%20the%20Plaine%20du%20Cul-de-Sac%20Area%20and%20Cit%C3%A9%20Soleil%20%28March%20-%20July%202026%29_1.pdf; *see also* Harriet Barber, *'It was a massacre': Haiti gangs carry out mass killings across the country*, The Guardian (Jul. 2, 2026), https://www.theguardian.com/global-development/2026/jul/02/it-was-a-massacre-haiti-gangs-carry-out-mass-killings-across-the-country (noting years of "unrelenting gang warfare" in Port-au-Prince that has allowed armed groups to take "control of large stretches of the capital," and massive increases in violent incidents involving armed groups in the Artibonite and Center Departments since 2021).

[50] *See* notes 94-97.

[51] *See generally* GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ ("In Haiti, assessments tend to focus on the territory gangs hold. But rural expansion suggests that freedom of movement may matter just as much. A group does not need to occupy a town permanently to shape governance, disrupt daily life or project power. The ability to strike repeatedly may be as significant as holding territory outright."); *see also* OHCHR, *High Commissioner Türk: We need all eyes on Haiti* (Oct. 2, 2026), https://www.ohchr.org/en/statements-and-speeches/2026/10/high-commissioner-turk-we-need-all-eyes-haiti ("Recent attacks in Kenscoff and Gressier, and the growing gang presence in the Sud-Est department, point to a strategy of seizing new territory and key transport routes, threatening stability across and beyond Haiti – and leaving destruction in its wake."); Rhinews, *Saint-Michel-de-l'Attalaye : une attaque armée à Marmont fait au moins un mort et trois blessés par balles…* (Sep. 16, 2026), https://www.rhinews.com/actualites/saint-michel-de-lattalaye-une-attaque-armee-a-marmont-fait-au-moins-un-mort-et-trois-blesses-par-balles/ (discussing the implications of increased armed group expansion in Artibonite Department, which "represents a gateway to the north"); FEWS, *Haiti - Food Security Outlook Update*, p. 2 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print ("The geographic expansion of armed gangs. . . . reflects a strategy aimed at strengthening control over secondary roads and production basins, further constraining economic and agricultural activities."); Jérôme Wendy Norestyl & Wilder Sylvain, *The new criminal alliance suffocating Artibonite*, AyiboPost (Apr. 8, 2026), https://ayibopost.com/the-new-criminal-alliance-suffocating-artibonite/; GI-TOC, *Brokers and Patrons: Unstitching Gangs from Haiti's Political Fabric*, pp. 8–9 (Mar. 2026), https://globalinitiative.net/wp-content/uploads/2026/03/Brokers-and-patrons-Unstitching-gangs-from-Haitis-political-fabric-GI-TOC-March-2026.pdf (expansion is enabled by armed groups' creation or absorption of "satellite criminal cells far beyond their original strongholds," offering examples of the *Canaan*, *5 Secongs*, and *400 Mawozo* armed groups); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 21, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 (armed group attacks in the Kenscoff area "are aimed at, among other objectives, opening a new criminal front and compelling security forces to redeploy, undermining their ability to hold recaptured territory in other areas"); UN Human Rights Council (**UN HRC**), *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 5 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (armed group' expansion has enabled them "to fortify strategic corridors and maintain dominance over critical maritime and overland trafficking routes that sustain their financing and operational resilience"); *cf.* Harriet Barber, *'It was a massacre': Haiti gangs carry out mass killings across the country*, The Guardian (Jul. 2, 2026), https://www.theguardian.com/global-development/2026/jul/02/it-was-a-massacre-haiti-gangs-carry-out-mass-killings-across-the-country (noting the entrenchment and expansion of armed group control "along [lucrative] key transit routes in and out of Port-au-Prince and along the border with the Dominican Republic").

[52] GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ (describing how massacres were "followed by territorial expansion"); BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 11 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting raids in the Artibonite communes of Dessalines, L'Estère, Petite-Rivière de

l'Artibonite, and Saint-Marc, during which armed group members killed residents while they slept inside their homes or in the streets as they tried to flee); María Fernanda Arocha, *Haiti's Kenscoff remains the target of deadly attacks. Why does this continue to happen?*, ACLED (Aug. 25, 2026), https://acleddata.com/expert-comment/haitis-kenscoff-remains-target-deadly-attacks-why-does-continue-happen ("The latest attack in Kenscoff. . . . is yet another example of how gangs rely on large-scale killings of civilians to subdue the local population and establish their authority."); Harriet Barber, *'It was a massacre': Haiti gangs carry out mass killings across the country*, The Guardian (Jul. 2, 2026), https://www.theguardian.com/global-development/2026/jul/02/it-was-a-massacre-haiti-gangs-carry-out-mass-killings-across-the-country; FEWS, *Haiti - Food Security Outlook Update*, p. 2 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print; *see also* Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees (security offensives against armed groups in early 2026 "changed the control of the city geographically, but . . . only increased the violence on the streets").

[53] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 39, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (armed groups control "strategic axes linking the capital to the north, the south and to the border with the Dominican Republic"); Likenton Joseph, *La POHDH publie son premier rapport trimestriel sur la situation des droits humains en Haïti*, Le National (Aug. 7, 2026), https://www.lenational.org/article/politique/8245/la-pohdh-publie-son-premier-rapport-trimestriel-sur-la-situation-des-droits-humains-en-haiti ("[F]reedom of movement remains restricted, with main roads controlled by armed gangs who have set up illegal tollbooths throughout the capital."); BINUH, *Flash Report: Haiti—Gang Violence: 613 Killed and 375 Injured in the Plaine du Cul-de-Sac and Cité Soleil Between March and July 2026*, pp. 21–22 (Aug. 6, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Flash%20Report%20-%20Intensification%20of%20Gang%20Violence%20in%20the%20Plaine%20du%20Cul-de-Sac%20Area%20and%20Cit%C3%A9%20Soleil%20%28March%20-%20July%202026%29_1.pdf; Harriet Barber, *'It was a massacre': Haiti gangs carry out mass killings across the country*, The Guardian (Jul. 2, 2026), https://www.theguardian.com/global-development/2026/jul/02/it-was-a-massacre-haiti-gangs-carry-out-mass-killings-across-the-country ("Some armed groups have also expanded towards Haiti's coastline, extorting payments from boats and carrying out armed robberies at sea, according to the Organised Crime and Corruption Reporting Project. The result is a struggle not only for neighbourhoods and main roads, but also for isolated stretches of farmland, border crossings and remote communities that sit astride the country's illicit trade corridors."); ICRC, *Haiti: Escalating armed violence in Port-au-Prince cuts people off from lifesaving services* (Apr. 2, 2026), https://www.icrc.org/en/article/haiti-escalating-armed-violence-cuts-people-off-lifesaving-services ("Densely populated and constrained by dozens of unofficial 'checkpoints', many areas of the [capital] city have become deadly traps from which escape is nearly impossible, especially during active fighting."); FEWS, *Haiti - Food Security Outlook Update*, p. 2 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print ("Despite ongoing security operations and the deployment of anti-gang forces, gangs continue to maintain and expand their control over strategic routes, especially National Road 1 (RN1), imposing movement restrictions, illegal payments, and heightened risks for transporters."). Additionally, air traffic in and out of Haiti remains constrained by insecurity. The Port-au-Prince international airport has been closed to commercial air traffic from the United States since November 12, 2024; in September, the ban was extended to March 2, 2027. Federal Aviation Administration, *KICZ A0046/26 NOTAM—Security—United States of America Prohibition Against Certain Flights in the Territory and Airspace of Haiti*, p. 1 (Sep. 1, 2026), https://www.faa.gov/air_traffic/publications/us_restrictions/KICZ_NOTAM_A0046-26_Haiti_Prohibition.pdf; *see also* Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html (according to the World Bank, "with the suspension of U.S. commercial flights into Port-au-Prince ongoing, the country has become more isolated"); Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees (describing the difficulties of entering Port-au-Prince by helicopter).

[54] *See* Section VI.

[55] Global Protection Cluster, *Haiti: Protection Analysis Update*, pp. 2, 6 (Sep. 24, 2026), https://globalprotectioncluster.org/sites/default/files/2026-09/PAU26_10_Protection_Analysis_Update_Haiti_Sep%202026.pdf; *see also* OHCHR, *High Commissioner Türk: We need all eyes on Haiti* (Oct. 2, 2026), https://www.ohchr.org/en/statements-and-speeches/2026/10/high-commissioner-turk-we-need-all-eyes-haiti (OHCHR documented "at least 5,700 people killed or injured by gangs or during operations against them" between January and September 2026, but did not provide a disaggregated number for killings); BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 3 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting 1,642 people killed in the first quarter of 2026 and 1,408 killed in the second). Other organizations have reported lower numbers in that same period. *See* HaitiLibre, *Haiti – Insecurity: A true national tragedy* (Aug. 1, 2026), https://www.haitilibre.com/en/news-48117-haiti-insecurity-a-true-national-tragedy.html (the Order of Human Rights Defenders reported 1,305, killed between January and June 2026); Plateforme des Organisations Haïtiennes des Droits Humains (**POHDH**), *Bilan semestriel : Crise de gouvernance renforcée et détérioration des conditions socioéconomiques, la POHDH dresse le bilan des six premiers mois de l'année 2026*, pp. 4-5, 7 (Jul. 2026), https://pohdh-ht.org/media/documents/BILAN_SEMESTRIEL_POHDH_juillet_2026.pdf (reporting more than 2,000 deaths; according to *La Commission Episcopale Justice et Paix*, 800 of those occurred in seven municipalities in the Port-au-Prince metropolitan area).

[56] Jacqueline Charles, *They came in silence: Why killings, abductions in Haiti mountain town have U.N. worried*, Miami Herald (Aug. 28, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317045603.html (noting that the August 2026 Kenscoff attack "is the latest in a series of attacks affecting the administrative district over the past 20 months"); Likenton Joseph, *La POHDH publie son premier rapport trimestriel sur la situation des droits humains en Haïti*, Le National (Aug. 7, 2026), https://www.lenational.org/article/politique/8245/la-pohdh-publie-son-premier-rapport-trimestriel-sur-la-situation-des-droits-humains-en-haiti ("More than a dozen massacres and gang attacks were recorded between January and July [2026], notably

in Bel-Air, Cité Soleil, Kenscoff, Croix-des-Bouquets, and the Lower Artibonite region."); GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ (discussing massacres in the Artibonite Department and Kenscoff, which were "meticulously planned," with armed groups blocking roads and bridges to prevent escape or security intervention and using drones for advance surveillance); Réseau National de Défense des Droits Humains (**RNDDH**), *Massacres à Kenscoff en juillet et en août 2026 : Le CSPN livre la population haïtienne sans protection ni défense*, ¶ 18 (Sep. 16, 2026), https://web.rnddh.org/wp-content/uploads/2026/09/7-Rap-Situation-DH-Kenscoff-16Sept2026.pdf (noting the use of drones and scouts to gather intelligence in advance of the Kenscoff attacks).

[57] BINUH, *Quarterly Report on the Human Rights Situation in Haiti (January–March 2026)*, p. 9 (May 8, 2026), https://binuh.unmissions.org/sites/default/files/2026-05/Q1%202026%20-%20ENGLISH.pdf.

[58] Harriet Barber, *'It was a massacre': Haiti gangs carry out mass killings across the country*, The Guardian (Jul. 2, 2026), https://www.theguardian.com/global-development/2026/jul/02/it-was-a-massacre-haiti-gangs-carry-out-mass-killings-across-the-country (describing the extreme brutality of the attack, which exposed "the extraordinary scale of the bloodshed that is spreading far beyond Haiti's urban areas"); RNDDH, *Massacre à Jean Denis : Le RNDDH dénonce la complaisance des autorités étatiques face aux attaques meurtrières des gangs armés* (Apr. 11, 2026), https://web.rnddh.org/wp-content/uploads/2026/04/3-Rap-Massacre-Jean-Denis-11Avr2026.FR_.pdf.

[59] The *Viv Ansanm* coalition was first formed in September 2023, then rebranded 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, although recently the UN Panel of Experts observed "violent fractures" within the coalition. UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 21, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; GI-TOC, *From Criminal Governance to Community Fragmentation: Addressing Haiti's Escalating Crisis*, pp. 12, 14 (Sep. 2025), https://globalinitiative.net/wp-content/uploads/2025/09/From-criminal-governance-to-community-fragmentation-Addressing-Haitis-escalating-crisis-GI-TOC-September-2025.pdf.

[60] *See* note 96.

[61] RNDDH, *Massacres à Kenscoff en juillet et en août 2026 : Le CSPN livre la population haïtienne sans protection ni défense* (Sep. 16, 2026), https://web.rnddh.org/wp-content/uploads/2026/09/7-Rap-Situation-DH-Kenscoff-16Sept2026.pdf; UN Office for the Coordination of Humanitarian Affairs (**OCHA**), *Haiti: nationwide humanitarian response (1 July to 31 August 2026)* (Oct. 1, 2026), https://reliefweb.int/report/haiti/haiti-nationwide-humanitarian-response-1-july-31-august-2026 (reporting 47 people killed during the August attack); María Fernanda Arocha, *Haiti's Kenscoff remains the target of deadly attacks. Why does this continue to happen?*, ACLED (Aug. 25, 2026), https://acleddata.com/expert-comment/haitis-kenscoff-remains-target-deadly-attacks-why-does-continue-happen; *see also* UN Secretary-General, *Noon briefing of 16 July 2026*, "Haiti" (Jul. 16, 2026), https://www.un.org/sg/en/content/highlight/2026-07-16.html (the July attack killed at least 61, including 14 children, and destroyed homes and telecommunications infrastructure); GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ (reporting the death toll from the July attack as anywhere between 61 and 105, and noting that the attack displaced nearly 6,000 people); UN, *Kenscoff Massacre Exposes Worsening Brutality of Haiti's Gang Crisis, Security Council Hears, as Speakers Urge Rapid International Support* (Aug. 28, 2026), https://press.un.org/en/2026/sc16444.doc.htm (discussing the "devastating human cost" of the August attack) (*internal quotations omitted*); UN Office at Geneva, *UN Geneva Press Briefing*, "Violence in Haiti" (Aug. 28, 2026), https://www.ungeneva.org/en/news-media/press-briefing/2026/08/un-geneva-press-briefing-2 (reporting at least 47 people killed in the August attack, including five children; 34 of those were executed after being forced from the church where they sought shelter); International Organization for Migration (**IOM**), *Haiti — Emergency Tracking Tool 105.1 — Updates on displacements following armed violence in the municipality of Kenscoff (23–30 August 2026)* (Aug. 31, 2026), https://dtm.iom.int/reports/haiti-emergency-tracking-tool-1051-updates-displacements-following-armed-violence (recording 4,238 people displaced following the August 23 attack); IOM, *Haiti — Emergency Tracking Tool 100.1 — Updates on Displacements following armed attacks in the municipality of Kenscoff — Department of West (4–9 July 2026)* (Jul. 9, 2026), https://dtm.iom.int/reports/haiti-emergency-tracking-tool-1001-updates-displacements-following-armed-attacks (recording 5,840 people displaced following the July attack).

[62] BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 7 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 ("In the Port-au-Prince metropolitan area, most gangs maintained their criminal governance in their strongholds, where they continued to commit targeted killings, serious physical assaults, and sexual violence against populations living under their control."); Harriet Barber, *'It was a massacre': Haiti gangs carry out mass killings across the country*, The Guardian (Jul. 2, 2026), https://www.theguardian.com/global-development/2026/jul/02/it-was-a-massacre-haiti-gangs-carry-out-mass-killings-across-the-country; UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 20, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 (noting their use of "violence as a social control mechanism").

[63] *See, e.g.*, Jacqueline Charles, *They came in silence: Why killings, abductions in Haiti mountain town have U.N. worried*, Miami Herald (Aug. 28, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317045603.html; BINUH, *Flash Report: Haiti—Gang Violence: 613 Killed and 375 Injured in the Plaine du Cul-de-Sac and Cité Soleil Between March and July 2026*, pp. 13-16 (Aug. 6, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Flash%20Report%20-%20Intensification%20of%20Gang%20Violence%20in%20the%20Plaine%20du%20Cul-de-Sac%20Area%20and%20Cit%C3%A9%20Soleil%20%28March%20-%20July%202026%29_1.pdf; UN Office at Geneva, *UN Geneva Press Briefing* (Aug. 28, 2026), https://www.ungeneva.org/en/news-media/press-briefing/2026/08/un-geneva-press-briefing-2.

[64] *See, e.g.*, RNDDH, *Massacres à Kenscoff en juillet et en août 2026 : Le CSPN livre la population haïtienne sans protection ni défense*, ¶ 28 (Sep. 16, 2026), https://web.rnddh.org/wp-content/uploads/2026/09/7-Rap-Situation-DH-Kenscoff-16Sept2026.pdf;

Jacqueline Charles, *They came in silence: Why killings, abductions in Haiti mountain town have U.N. worried*, Miami Herald (Aug. 28, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317045603.html; Harriet Barber, *'It was a massacre': Haiti gangs carry out mass killings across the country*, The Guardian (Jul. 2, 2026), https://www.theguardian.com/global-development/2026/jul/02/it-was-a-massacre-haiti-gangs-carry-out-mass-killings-across-the-country; RNDDH, *Massacre à Jean Denis : Le RNDDH dénonce la complaisance des autorités étatiques face aux attaques meurtrières des gangs armés*, ¶ 19 (Apr. 11, 2026), https://web.rnddh.org/wp-content/uploads/2026/04/3-Rap-Massacre-Jean-Denis-11Avr2026.FR_.pdf; Médecins Sans Frontières (**MSF**), *MSF resumes care at maternity hospital in Haitian capital* (Jul. 29, 2026), https://www.doctorswithoutborders.org/latest/msf-resumes-care-maternity-hospital-haitian-capital.

[65] *See* Section V.

[66] *See, e.g.*, Hervé Noël, *Crânes humains décapités, béton cyclopéen: la route nationale #1 coupée à Carriès*, Rezo Nòdwès (Aug. 5, 2026), https://rezonodwes.com/2026/08/cranes-humains-decapites-beton-cyclopeen-la-route-nationale-1-coupee-a-carries/; UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 35, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241.

[67] *See, e.g.*, BINUH, *Flash Report: Haiti—Gang Violence: 613 Killed and 375 Injured in the Plaine du Cul-de-Sac and Cité Soleil Between March and July 2026*, pp. 13-14 (Aug. 6, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Flash%20Report%20-%20Intensification%20of%20Gang%20Violence%20in%20the%20Plaine%20du%20Cul-de-Sac%20Area%20and%20Cit%C3%A9%20Soleil%20%28March%20-%20July%202026%29_1.pdf.

[68] *See, e.g.*, UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 70, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April–June 2026)*, p. 10 (Aug. 25, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Q2%202026%20-%20EN-V3.pdf; Jacqueline Charles, *They came in silence: Why killings, abductions in Haiti mountain town have U.N. worried*, Miami Herald (Aug. 28, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317045603.html; Harriet Barber, *'It was a massacre': Haiti gangs carry out mass killings across the country*, The Guardian (Jul. 2, 2026), https://www.theguardian.com/global-development/2026/jul/02/it-was-a-massacre-haiti-gangs-carry-out-mass-killings-across-the-country (during the March attack on Jean-Denis, "[d]ozens of men wearing civilian clothes and bandanas, with rifles slung around their necks, swarm[ed] through the village, shooting indiscriminately" and gunning down residents attempting to flee).

[69] *See, e.g.*, UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 70, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; Jeanne Saintéus, *Trois morts enregistrés lors d'une attaque armée à Gressier*, Le Nouvelliste (Aug. 19, 2026), https://lenouvelliste.com/article/271076/trois-morts-enregistres-lors-dune-attaque-armee-a-gressier; UN Secretary-General, *Noon briefing of 16 July 2026* (Jul. 16, 2026), https://www.un.org/sg/en/content/highlight/2026-07-16.html; Harriet Barber, *'It was a massacre': Haiti gangs carry out mass killings across the country*, The Guardian (Jul. 2, 2026), https://www.theguardian.com/global-development/2026/jul/02/it-was-a-massacre-haiti-gangs-carry-out-mass-killings-across-the-country ("[In Jean-Denis, h]ome after home is set ablaze, some with residents trapped inside. By morning, thick columns of smoke still rise from houses, the once-colourful painted buildings reduced to charred shells."); RNDDH, *Massacre à Jean Denis : Le RNDDH dénonce la complaisance des autorités étatiques face aux attaques meurtrières des gangs armés*, ¶¶ 14, 17–19 (Apr. 11, 2026), https://web.rnddh.org/wp-content/uploads/2026/04/3-Rap-Massacre-Jean-Denis-11Avr2026.FR_.pdf.

[70] GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ (an armed group leader posted a video to social media threatening to kill hostages if security forces intervened); Dánica Coto, *US pledges to crack down on Haitian gangs making money off social media*, Associated Press (Jul. 20, 2026), https://www.wlrn.org/americas/2026-07-20/us-pledges-to-crack-down-on-haitian-gangs-making-money-off-social-media; Ambassador Mike Waltz, *Remarks at a UN Security Council Briefing on Haiti*, U.S. Mission to the UN (Jul. 20, 2026), https://www.globalsecurity.org/military/library/news/2026/07/mil-260720-usmissionun01.htm.

[71] *See, e.g.*, BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, pp. 7, 10 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (describing incidents in which armed groups killed their own members who were accused of rape, as well as civilians who engaged "in behavior supposedly prohibited by gangs, particularly theft"); Jess DiPierro Obert, *US funding cuts fuel child recruitment into Haiti's armed groups*, The New Humanitarian (Aug. 19, 2026), https://www.thenewhumanitarian.org/news-feature/2026/08/19/us-funding-cuts-fuel-child-recruitment-haitis-armed-groups ("In Cité Soleil, for instance, gangs have foundations providing basic public infrastructure because they understand that it's them or nobody.") (*internal quotations omitted*); Jérôme Wendy Norestyl & Wilder Sylvain, *The new criminal alliance suffocating Artibonite*, AyiboPost (Apr. 8, 2026), https://ayibopost.com/the-new-criminal-alliance-suffocating-artibonite/ (in advance of a merger between the *Gran Grif* and *Kokorat San Ras* armed groups, the latter "distributed money to residents of Dessalines to discourage them from fleeing, making them believe they were preventing the . . . [*Gran Grif*] gang from invading the area"); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 20, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("Amid gaps in State service provision, certain gangs have offered funeral assistance and financed medical care for residents injured during security operations."); *see also* UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 38, 141, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (for example, "a parallel governance system supports the continued functioning of daily life [in Carrefour], [where] gang leaders and other criminals . . . have continued to enjoy freedom"); GI-TOC, *Brokers and Patrons: Unstitching Gangs from Haiti's Political Fabric*, p. 12 (Mar. 2026), https://globalinitiative.net/wp-content/uploads/2026/03/Brokers-and-patrons-Unstitching-gangs-from-Haitis-political-fabric-GI-TOC-March-2026.pdf (armed group leaders are "presenting themselves as forces of stabilization or even pacification").

[72] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 69, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (the leader of the Wharf Jéremie armed group has prevented "wounded local

residents from leaving the neighbourhood to seek medical care"); BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, pp. 7, 9-11, 13 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026; Jérôme Wendy Norestyl, *Krisla imposed unlawful housing tax in Carrefour*, AyiboPost (Aug. 9, 2026), https://ayibopost.com/krisla-imposes-a-tax-on-homes-in-carrefour/ (describing the system of extortion that an armed group leader in Carrefour has imposed on residents, which includes "taxes" on houses, businesses, money transfers, and movement); BINUH, *Flash Report: Haiti—Gang Violence: 613 Killed and 375 Injured in the Plaine du Cul-de-Sac and Cité Soleil Between March and July 2026*, pp. 13-16, 18 (Aug. 6, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Flash%20Report%20-%20Intensification%20of%20Gang%20Violence%20in%20the%20Plaine%20du%20Cul-de-Sac%20Area%20and%20Cit%C3%A9%20Soleil%20%28March%20-%20July%202026%29_1.pdf; ICRC, *Haiti: Escalating armed violence in Port-au-Prince cuts people off from lifesaving services* (Apr. 2, 2026), https://www.icrc.org/en/article/haiti-escalating-armed-violence-cuts-people-off-lifesaving-services ("Densely populated and constrained by dozens of unofficial 'checkpoints', many areas of the [capital] city have become deadly traps from which escape is nearly impossible, especially during active fighting."); *see also* Romain Le Cour Grandmaison, *Why a security approach alone isn't enough to rid Haiti of gangs*, The New Humanitarian (Apr. 29, 2026), https://www.thenewhumanitarian.org/opinion/2026/04/29/why-security-approach-alone-isnt-enough-rid-haiti-gangs ("In exchange for payments, gangs enable the circulation of goods or the functioning of critical infrastructure, such as ports. When these arrangements are challenged, violence is used to reassert control, for example through blockades or targeted attacks, until the terms of exchange are restored.").

[73] Alterpresse, *Haïti-Artibonite-Violences : Plus d'une centaine de victimes en un mois et demi, l'action de la Frg toujours attendue* (Sep. 18, 2026), https://www.alterpresse.org/Haiti-Artibonite-Violence-Plus-d-une-centaine-de-victimes-en-un-mois-et-demi-l-action-de-la-FRG-toujours-attendue; BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, pp. 7, 9-11, 13 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026; BINUH, *Flash Report: Haiti—Gang Violence: 613 Killed and 375 Injured in the Plaine du Cul-de-Sac and Cité Soleil Between March and July 2026*, pp. 13-16, 18 (Aug. 6, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Flash%20Report%20-%20Intensification%20of%20Gang%20Violence%20in%20the%20Plaine%20du%20Cul-de-Sac%20Area%20and%20Cit%C3%A9%20Soleil%20%28March%20-%20July%202026%29_1.pdf; Edith M. Lederer, *UN expert: Haiti has a chance now to tackle gang violence as new international force deploys*, Associated Press (Mar. 16, 2026), https://apnews.com/article/un-haiti-gang-suppression-force-us-1e370b6e0fd40ac9dad33751e08c6cea; UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 67-69, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (the leader of the Ti Bwa armed group "has continued to administer cruel punishment as part of arbitrary "justice" . . ., shooting individuals in the hands and feet on several occasions in Carrefour;" during clashes between rival armed groups, opponents have also directly targeted civilians living in their rival's neighborhood); *see also id.* at ¶¶ 41-44 (discussing the fracturing of certain alliances within the *Viv Ansanm* coalition and the resulting increase in clashes between armed groups, with significant civilian casualties).

[74] UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶¶ 2, 4 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74.

[75] IOM, *Displacement situation in Haiti as of August 2026—Round 14*, p. 4 (Sep. 23, 2026), https://reliefweb.int/attachments/48fe6337-3f91-5db4-b13f-90bbfa07bed9/Displacement%20situation%20in%20Haiti%20-%20Round%2014%20-%20August%202026_0.pdf (reporting 1,494,456 people internally displaced, representing a 2% increase since the last assessment in May 2026); *see also* UN, *Kenscoff Massacre Exposes Worsening Brutality of Haiti's Gang Crisis, Security Council Hears, as Speakers Urge Rapid International Support* (Aug. 28, 2026), https://press.un.org/en/2026/sc16444.doc.htm (the head of BINUH noted that "[d]isplacement has doubled in just two years").

[76] *See* IOM, *Haiti — Emergency Tracking Tool 110.1 — Updates on displacements following armed violence in the commune of Gros Morne in Artibonite (28 September–6 October 2026)* (Oct. 7, 2026), https://dtm.iom.int/reports/haiti-emergency-tracking-tool-1101-updates-displacements-following-armed-violence-commune (attacks in Gros-Morne in late September displaced 8,486 people); IOM, *Haiti — Emergency Tracking Tool 109 — Displacements following armed violence in the commune of Saint-Michel de l'Attalaye (15–18 September 2026)* (Sep. 19, 2026), https://dtm.iom.int/reports/haiti-emergency-tracking-tool-109-displacements-following-armed-violence-commune-saint (documenting 601 people displaced after violence in Nan Paul on September 15); IOM, *Haiti — Emergency Tracking Tool 108 — Displacements following armed violence in the communes of Saint-Marc and Verrettes (12–17 September 2026)* (Sep. 18, 2026), https://dtm.iom.int/reports/haiti-emergency-tracking-tool-108-displacements-following-armed-violence-communes-saint (documenting 904 people displaced after violence in Saint-Marc and Verrettes on September 12); Alterpresse, *Haïti-Artibonite-Violences : Plus d'une centaine de victimes en un mois et demi, l'action de la Frg toujours attendue* (Sep. 18, 2026), https://www.alterpresse.org/Haiti-Artibonite-Violence-Plus-d-une-centaine-de-victimes-en-un-mois-et-demi-l-action-de-la-FRG-toujours-attendue (attacks in Petite Rivière de l'Artibonite in August displaced at least 894 people"); IOM, *Haiti — Emergency Tracking Tool 107 — Displacements following armed violence in the municipality of Gressier (4–8 September 2026)* (Sep. 9, 2026), https://dtm.iom.int/reports/haiti-emergency-tracking-tool-107-displacements-following-armed-violence-municipality (violence in La Colline and Bellevue in early September displaced 704 people); IOM, *Haiti — Emergency Tracking Tool 105.1 — Updates on displacements following armed violence in the municipality of Kenscoff (23–30 August 2026)* (Aug. 31, 2026), https://dtm.iom.int/reports/haiti-emergency-tracking-tool-1051-updates-displacements-following-armed-violence (reporting 4,238 people displaced after the August attack in Kenscoff).

[77] IOM, *Displacement situation in Haiti as of August 2026—Round 14*, p. 4 (Sep. 23, 2026), https://reliefweb.int/attachments/48fe6337-3f91-5db4-b13f-90bbfa07bed9/Displacement%20situation%20in%20Haiti%20-%20Round%2014%20-%20August%202026_0.pdf (102 sites in the Port-au-Prince metropolitan area host 204,750 IDPs; 134 sites in the provinces host 15,498 IDPs). The remaining 85% of IDPs are staying with host families or otherwise outside of displacement sites.

[78] IOM, *Displacement situation in Haiti as of August 2026—Round 14*, p. 14 (Sep. 23, 2026), https://reliefweb.int/attachments/48fe6337-3f91-5db4-b13f-90bbfa07bed9/Displacement%20situation%20in%20Haiti%20-%20Round%2014%20-%20August%202026_0.pdf (in the Port-au-Prince metropolitan area, 40% of IDPs live in schools, 38% in

fenced areas (both covered and uncovered), 17% in churches/temples, 4% in uncovered and unfenced areas, and 1% in covered and unfenced areas); *see also* Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees (a displaced woman describes sleeping "on the floor of a school classroom with fifty other displaced people, where hanging sheets divide the room into smaller pods for modest privacy").

[79] OCHA, *Haiti Humanitarian Bulletin March - May 2026*, p. 2 (Jul. 13, 2026), https://reliefweb.int/report/haiti/ocha-haiti-humanitarian-bulletin-march-may-2026 ("Host communities are also coming under increasing strain. . . .[, as] local residents, who were already vulnerable, are now facing the growing pressure of accommodating displaced populations."); Jovani Davis, *UN warns of new displacement crisis in Haiti as violence forces more than 1,100 people to flee*, News Caribbean Haiti (Jun. 2, 2026), https://www.caribbeannationalweekly.com/posts/un-warns-of-new-displacement-crisis-in-haiti-as-violence-forces-more-than-1100-people-to-flee (noting IDPs' housing, food, healthcare, and psychosocial needs and the resulting strain on "threadbare resources" in host communities); FEWS, *Haiti - Food Security Outlook Update*, p. 2 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print ("Pressure on host households in rural areas is increasing nutritional risks, especially for children."); *see also* IOM, *Displacement situation in Haiti as of August 2026—Round 14*, p. 23 (Sep. 23, 2026), https://reliefweb.int/attachments/48fe6337-3f91-5db4-b13f-90bbfa07bed9/Displacement%20situation%20in%20Haiti%20-%20Round%2014%20-%20August%202026_0.pdf (reporting that some households displaced from Mirebalais and Saut-d'Eau returned despite continuing insecurity because of poor conditions and lack of livelihoods in host communities).

[80] UN, *Kenscoff Massacre Exposes Worsening Brutality of Haiti's Gang Crisis, Security Council Hears, as Speakers Urge Rapid International Support* (Aug. 28, 2026), https://press.un.org/en/2026/sc16444.doc.htm ("conditions in many displacement sites are squalid," according to the head of BINUH); POHDH, *Bilan semestriel : Crise de gouvernance renforcée et détérioration des conditions socioéconomiques, la POHDH dresse le bilan des six premiers mois de l'année 2026*, p. 11 (Jul. 2026), https://pohdh-ht.org/media/documents/BILAN_SEMESTRIEL_POHDH_juillet_2026.pdf (describing famine, disease, poor sanitation, limited or no access to potable water, and no healthcare in displacement sites; in some camps, there are over 10,000 people with just a few functioning toilets); Bureau des Avocats Internationaux (**BAI**), *Camp Toto Report*, pp. 7-11 (Jul. 2026) (on file with authors) (during a June 29, 2026 visit Camp Toto in Carradeux, Delmas, which houses both people displaced by the 2010 earthquake and newer arrivals fleeing armed violence, the BAI found that there was no public water distribution network, adequate sanitation system, or public health center within the camp, and that shelters were "mainly constructed of corrugated iron, wood, tarps, and other makeshift materials that have deteriorated significantly over the years"); Tirana Hassan, *The Crisis I Witnessed in Haiti*, TIME (Jun. 26, 2026), https://time.com/article/2026/06/25/the-crisis-i-witnessed-in-haiti/ ("Groups of families with up to 40 people are sharing single rooms in public buildings such as schools. . . . Our teams, who provide care to displaced people through mobile clinics, have also seen a rise in scabies linked to the lack of clean water and poor living conditions."); Junior Legrand, *Une quinzaine de camps de déplacés dans des zones contrôlées par les gangs*, AyiboPost (Jun. 23, 2026), https://backoffice.ayibopost.com/une-quinzaine-de-camps-de-deplaces-dans-des-zones-controlees-par-les-gangs/ (a displaced woman says there is not enough to eat in the camp where she lives); Organisation des Citoyens pour une Nouvelle Haïti (**OCNH**), *Violations des droits des personnes déplacées dans la région métropolitaine* (Jun. 2, 2026), https://www.ocnh.org/articles/violations-droits-personnes-deplacees-region-metropolitaine ("limited access to drinking water and sanitation facilities" is a recurring issue); OCHA, *Haiti: Violence and displacement in the Artibonite Department (Situation Report as of 17 April 2026)*, pp. 1–2 (Apr. 20, 2026), https://www.unocha.org/attachments/5e309389-1707-46d8-be0a-6666b6505310/Sitrep_Violence_displacement_in_the_Artibonite_Department.pdf (a Pan American Health Organization (**PAHO**)/World Health Organization (**WHO**) survey of 13,054 IDPs across 26 sites and 112 host communities in the Artibonite Department found "cases of acute watery diarrhoea, bloody diarrhoea, and other conditions"); UN News, *Haiti's freefall demands urgent global action as millions face hunger and violence* (Apr. 10, 2026), https://news.un.org/en/story/2026/04/1167283 (a school built for 400 students "now shelters some 2,800 people," with occupants describing vermin and roaches at night, and skin rashes on children). Climate-related challenges exacerbate these vulnerabilities. *See* Junior Legrand, *Une quinzaine de camps de déplacés dans des zones contrôlées par les gangs*, AyiboPost (Jun. 23, 2026), https://backoffice.ayibopost.com/une-quinzaine-de-camps-de-deplaces-dans-des-zones-controlees-par-les-gangs/ (a displaced woman residing in a camp in Martissant says that "[d]uring the rainy season, the floodwaters force . . . [camp residents] to stand for hours on end without being able to sleep").

[81] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 65, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("Displacement . . . heightens vulnerability and increases exposure to human rights violations and abuses."); GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ (noting that during the August Kenscoff attack, armed groups attacked a church housing IDPs); International Rescue Committee (**IRC**), *Families in Haiti Face Impossible Choices as Violence Surges and Services Collapse, IRC Finds* (Apr. 16, 2026), https://www.rescue.org/press-release/families-haiti-face-impossible-choices-violence-surges-and-public-services-collapse (73% of households surveyed by the IRC in the West, Artibonite, and Center Departments "report[ed] feeling unsafe where they sleep, with the majority of displaced families sheltering in insecure, overcrowded conditions").

[82] Junior Legrand, *Une quinzaine de camps de déplacés dans des zones contrôlées par les gangs*, AyiboPost (Jun. 23, 2026), https://backoffice.ayibopost.com/une-quinzaine-de-camps-de-deplaces-dans-des-zones-controlees-par-les-gangs/ (a resident of one of these cites also said "[s]he fears the constant threat of explosive drones and armored vehicles of the Haitian National Police (PNH)," which "are stationed on the outskirts of several gang-controlled areas and often target unarmed civilians, mistaking them for bandits"); *cf.* MSF, *In Cité Soleil, people risk their lives to seek medical care* (Jul. 22, 2026), https://www.msf.org/haiti-people-risk-their-lives-seek-medical-care (describing the stigma that people from Cité Soleil experience "simply because of where they live," with residents afraid to enter other neighborhoods because "[t]hey could be mistaken for members of armed groups, or suspected by the Haitian police of being linked to them") (*internal quotations omitted*). For example, Dieunel Fleury Jean, consultant for IJDH and Haitian human rights law firm the BAI, shared that residents of Bon Repos and Solino fled to safer neighborhoods but were forced to return to areas controlled by armed groups or entered makeshift shelters after losing income and becoming unable to pay rent. (Notes on file with authors).

[83] IOM, *Displacement situation in Haiti as of August 2026—Round 14*, p. 8 (Sep. 23, 2026), https://reliefweb.int/attachments/48fe6337-3f91-5db4-b13f-90bbfa07bed9/Displacement%20situation%20in%20Haiti%20-%20Round%2014%20-%20August%202026_0.pdf (women and girls represent 55% of all IDPs and children (both boys and girls) 52%).

[84] UNFPA, *Situation Report: Haiti: Displacement from escalation in gang violence, 1 July–31 August 2026*, p. 2 (Sep. 2026), https://www.unfpa.org/sites/default/files/resource-pdf/Situation%20Report_Haiti_Jul-Aug%202026.pdf (linking heightened sexual-violence risks for women and girls in sites to poor conditions and inadequate protection and services); OCNH, *Violations des droits des personnes déplacées dans la région métropolitaine* (Jun. 2, 2026), https://www.ocnh.org/articles/violations-droits-personnes-deplacees-region-metropolitaine (noting "increased exposure of women and girls to violence" in displacement sites); *see also* notes 242-245.

[85] Harriet Barber, *'It was a massacre': Haiti gangs carry out mass killings across the country*, The Guardian (Jul. 2, 2026), https://www.theguardian.com/global-development/2026/jul/02/it-was-a-massacre-haiti-gangs-carry-out-mass-killings-across-the-country (noting "little state support" for people displaced by the March 2026 massacre in Jean-Denis); Junior Legrand, *Une quinzaine de camps de déplacés dans des zones contrôlées par les gangs*, AyiboPost (Jun. 23, 2026), https://backoffice.ayibopost.com/une-quinzaine-de-camps-de-deplaces-dans-des-zones-controlees-par-les-gangs/ (residents of displacement sites located in Martissant and La Saline describe feeling abandoned by the state); *see also* IOM, *Displacement situation in Haiti as of August 2026—Round 14*, p. 10 (Sep. 23, 2026), https://reliefweb.int/attachments/48fe6337-3f91-5db4-b13f-90bbfa07bed9/Displacement%20situation%20in%20Haiti%20-%20Round%2014%20-%20August%202026_0.pdf (noting that "an initiative undertaken by authorities to close a number of [displacement] sites within [the metropolitan area of Port-au-Prince" resulted in the closure of six sites hosting over 21,000 IDPs, but "did not result in a proportional decrease in the number of displaced persons living in sites in the capital").

[86] Junior Legrand, *Une quinzaine de camps de déplacés dans des zones contrôlées par les gangs*, AyiboPost (Jun. 23, 2026), https://backoffice.ayibopost.com/une-quinzaine-de-camps-de-deplaces-dans-des-zones-controlees-par-les-gangs/ (access difficulties prevent humanitarian organizations from providing adequate support to residents of displacement sites in La Saline and Martissant); POHDH, *Bilan semestriel : Crise de gouvernance renforcée et détérioration des conditions socioéconomiques, la POHDH dresse le bilan des six premiers mois de l'année 2026*, p. 11 (Jul. 2026), https://pohdh-ht.org/media/documents/BILAN_SEMESTRIEL_POHDH_juillet_2026.pdf (describing interruptions in community food programs; the suspension of food-kit distributions for several months; and infrequent and irregular financial assistance in displacement sites); BAI, *Camp Toto Report*, pp. 8-9 (Jul. 2026) (on file with authors) (residents of Camp Toto in Delmas – which houses both people displaced by the 2010 earthquake and newer arrivals fleeing armed violence – reported that there has been no humanitarian assistance in the camp since 2014); Swedish International Development Cooperation Agency, *Humanitarian Crisis Analysis 2026: Haiti*, pp. 3–4 (Mar. 31, 2026), https://cdn.sida.se/app/uploads/2026/04/22144225/Haiti-HCA-2026_March-2026-Short.pdf (identifying site-management gaps and severe unmet needs among households in spontaneous sites, and connecting reduced donor support with chronic underfunding of camp coordination and camp management, shelter, and essential services); *see also* OCNH, *Violations des droits des personnes déplacées dans la région métropolitaine* (Jun. 2, 2026), https://www.ocnh.org/articles/violations-droits-personnes-deplacees-region-metropolitaine (noting that displaced persons often lack identity documents, "which blocks access to services").

[87] *See* notes 24, 190.

[88] Committee to Protect Journalists (**CPJ**), *Veteran Haitian journalist Wesly Renaud Jean abducted, ransom requested* (Sep. 12, 2026), https://cpj.org/2026/09/veteran-haitian-journalist-wesly-renaud-jean-abducted-ransom-requested/ (CPJ regional director for the Americas noted "the growing threat that rampant gang violence poses to journalists in Haiti"); IACHR, Office of the Special Rapporteur for Freedom of Expression, *The SRFOE condemns renewed violence against the press in Haiti and urges authorities to investigate and ensure accountability*, Press Release No. R051/26 (Mar. 26, 2026), https://oas.org/en/IACHR/jsForm/?File=/en/iachr/expression/media_center/preleases/2026/051.asp (condemning the kidnapping of two journalists and an armed attack against a third in March 2026 as part of "a pattern of systematic violence against the press in Haiti" that "deepen[s] a climate of censorship;" the Special Rapporteur for Freedom of Expression documented "at least 17 kidnappings, 2 enforced disappearances, 13 armed attacks against journalists, and 6 attacks on media outlets [in Haiti between 2018 and 2025], placing the lives of more than 41 media professionals at risk"); CPJ, *2 Haitian journalists abducted amid intensifying violence in Port-au-Prince* (Mar. 17, 2026), https://cpj.org/2026/03/2-haitian-journalists-abducted-amid-intensifying-violence-in-port-au-prince/ (CPJ U.S., Canada, and Caribbean Program Coordinator says "[v]iolence in Haiti is at an intolerable level, making it nearly impossible for journalists to do their jobs safely;" according to the UN's independent expert on human rights in Haiti, the country is "one of the most dangerous places to be a journalist); Reporters Without Borders (**RSF**), *Haiti: Portraits of Junior Célestin and Osnel Espérance, journalists abducted in Port-au-Prince and presumed executed* (May 26, 2026), https://rsf.org/en/haiti-portraits-junior-c%C3%A9lestin-and-osnel-esp%C3%A9rance-journalists-abducted-port-au-prince-and ("[J]ournalism in Haiti is increasingly becoming an exercise in survival."); RSF, *Haiti: Gang violence continues to shrink space for journalism* (Sep. 18, 2026), https://rsf.org/en/haiti-gang-violence-continues-shrink-space-journalism (reporting the abductions of two journalists in August and September, and a separate attack on three photojournalists covering a funeral in Kenscoff on September 2); RSF, *World Press Freedom Index* (2026), https://rsf.org/en/index (ranking Haiti 107 out of 180 countries; "[c]aught between a wave of widespread violence and the social, economic and political crisis, [journalists] . . . are targeted by gangs and are often victims of threats, attacks, kidnapping and murder — crimes met with complete impunity").

[89] CPJ, *2 Haitian journalists abducted amid intensifying violence in Port-au-Prince* (Mar. 17, 2026), https://cpj.org/2026/03/2-haitian-journalists-abducted-amid-intensifying-violence-in-port-au-prince/ (they were abducted while "on an assignment near a gang-controlled neighborhood," allegedly by members of the *5 Segonn* armed group); RSF, *Haiti: Portraits of Junior Célestin and Osnel Espérance, journalists abducted in Port-au-Prince and presumed executed* (May 26, 2026), https://rsf.org/en/haiti-portraits-junior-c%C3%A9lestin-and-osnel-esp%C3%A9rance-journalists-abducted-port-au-prince-and ("Although both journalists are now presumed executed following an investigation by the National Network of Haitian Journalists (RENAJOUH), there is still no

public and independent confirmation regarding their fate or any verifiable information concerning their bodies, in an environment marked by opacity, extreme violence and the absence of clear official information."); RSF, *Haiti: Gang violence continues to shrink space for journalism* (Sep. 18, 2026), https://rsf.org/en/haiti-gang-violence-continues-shrink-space-journalism.

[90] CPJ, *Haitian community radio director Willard Vancol found dead nearly 3 weeks after abduction* (Sep. 10, 2026), https://cpj.org/2026/09/haitian-community-radio-director-willard-vancol-found-dead-nearly-3-weeks-after-abduction/; RSF, *Haiti: Gang violence continues to shrink space for journalism* (Sep. 18, 2026), https://rsf.org/en/haiti-gang-violence-continues-shrink-space-journalism (Vancol's murder led to the closure of radio station Ti Boukan FM, which was the only local radio station serving Petit-Boucan, a community in Gressier, southwest of Port-au-Prince and "had already been operating at a bare minimum for the past two years, after threats from gangs forced it to suspend its regular programming;" the loss deprives Petit-Boucan's "residents of a source of local information at a time when gangs now control the commune"); *see also* Romina Acosta Bimbrera, *Joseph Willard Vancol: A life dedicated to serving his community*, Development and Peace – Caritas Canada (Sep. 18, 2026), https://devp.org/en/joseph-willard-vancol-a-life-dedicated-to-serving-his-community/ (Vancol's long-standing institutional partner describes his advocacy for rural communities, his work strengthening farming organizations, and the attack's damage to community radio and training activities).

[91] CPJ, *Veteran Haitian journalist Wesly Renaud Jean abducted, ransom requested* (Sep. 12, 2026), https://cpj.org/2026/09/veteran-haitian-journalist-wesly-renaud-jean-abducted-ransom-requested/; Daniella Saint-Louis, *Le journaliste Wesly Renaud Jean libéré après environ trois semaines de séquestration*, Gazette Haïti (Sep. 28, 2026), https://mail.gazettehaiti.com/node/14338.

[92] RSF, *Haiti: Portraits of Junior Célestin and Osnel Espérance, journalists abducted in Port-au-Prince and presumed executed* (May 26, 2026), https://rsf.org/en/haiti-portraits-junior-c%C3%A9lestin-and-osnel-esp%C3%A9rance-journalists-abducted-port-au-prince-and ("Widlore Mérancourt, the editor-in-chief of the *AyiboPost* news site . . . stressed that journalists are generally exposed to accusations from both sides and may be perceived by both police and armed groups as informants for the other side. . . . A Haitian journalist who requested anonymity for security reasons said the situation is particularly critical for field reporters, especially those working for online media outlets. He said they are often subjected to verbal and physical attacks and find themselves caught between conflicting suspicions. . . . Beyond the psychological impact, Haitian journalists suffer from a severe lack of resources. Several sources stressed to RSF the urgent need for protective equipment and training adapted to a high-risk environment."); RSF, *World Press Freedom Index* (2026), https://rsf.org/en/index ("Haiti's journalists suffer from a cruel lack of financial resources.").

[93] IACHR, Office of the Special Rapporteur for Freedom of Expression, *The SRFOE condemns renewed violence against the press in Haiti and urges authorities to investigate and ensure accountability*, Press Release No. R051/26 (Mar. 26, 2026), https://oas.org/en/IACHR/jsForm/?File=/en/iachr/expression/media_center/preleases/2026/051.asp ("[T]he lack of effective investigations by police and judicial authorities has prevented the identification of most perpetrators, while high levels of impunity have enabled these crimes to persist."); RSF, *Haiti: Portraits of Junior Célestin and Osnel Espérance, journalists abducted in Port-au-Prince and presumed executed* (May 26, 2026), https://rsf.org/en/haiti-portraits-junior-c%C3%A9lestin-and-osnel-esp%C3%A9rance-journalists-abducted-port-au-prince-and (the government's failure to publicly comment on the March kidnapping of two journalists "reinforces the sense of abandonment within the profession and among the victims' relatives"); RSF, *World Press Freedom Index* (2026), https://rsf.org/en/index (noting "an absence of institutional support" for journalists and "complete impunity" for crimes against them). Unsolved murders of journalists include Brignol Lindor, Jean Dominique and Jacques Roche and publicist François 'Fanfan' Latour. *See* Juhakenson Blaise, *Nègès Mawon renews calls for justice for slain Haitian journalist Antoinette Duclaire*, Haitian Times (Jul. 1, 2026), https://haitiantimes.com/2026/07/01/neges-mawon-commemorates-antoinette-duclaire-calls-for-justice/ (there is a "growing list of unresolved high-profile killings" of journalists in recent years, including Brignol Lindor, Jean Dominique, and Jacques Roche).

[94] *See* Dánica Coto & Evens Sanon, *Haiti struggles with rise in kidnappings as general election looms*, Washington Post (Oct. 1, 2026), https://www.washingtonpost.com/world/2026/10/01/haiti-kidnappings-gangs-force/20054300-bdb4-11f1-81fc-9b76f8343b6c_story.html; GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/.

[95] Dánica Coto & Evens Sanon, *Haiti struggles with rise in kidnappings as general election looms*, Washington Post (Oct. 1, 2026), https://www.washingtonpost.com/world/2026/10/01/haiti-kidnappings-gangs-force/20054300-bdb4-11f1-81fc-9b76f8343b6c_story.html (GI-TOC's Romain Le Cour emphasized "that a high-value hostage sends a political message and means a larger ransom and protection for a gang's territory against an offensive"); GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ ("Hostages can also serve as a substitute for large-scale territorial occupation. While fixed positions require personnel and resources, and are vulnerable to attack, holding captives requires far less operational investment, while providing leverage for ransom negotiations. Furthermore, public threats, such as those made by [armed group leader] Didi on 23 August [in Kenscoff], are designed to put the authorities in a no-win situation: inaction would demonstrate the state's inability to protect its population, whereas intervention could enable the gang to blame the police for any subsequent fatalities."); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 136-137, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April–June 2026)*, p. 16 (Aug. 25, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Q2%202026%20-%20EN-V3.pdf (the circumstances of some kidnappings "suggest that the victims had been previously targeted and monitored by gang members"); La Rédaction, *Haïti/Justice- Affaire Dr Audie Métayer : deux suspects déférés, un réseau criminel présumé impliquant plusieurs complices recherché par la justice, selon une source judiciaire…*, Rhinews (Jun. 7, 2026), https://www.rhinews.com/justice/haiti-justice-affaire-dr-audie-metayer-deux-suspects-deferes-un-reseau-criminel-presume-impliquant-plusieurs-complices-recherche-par-la-justice-selon-une-source-judiciaire/ (a judicial investigation into a kidnapping plot revealed "surveillance, reconnaissance, logistical preparation and coordination between several individuals"); GI-TOC, *Brokers and Patrons: Unstitching Gangs from Haiti's Political Fabric*, pp. 18–19 (Mar. 2026), https://globalinitiative.net/wp-content/uploads/2026/03/Brokers-and-patrons-Unstitching-gangs-from-Haitis-political-fabric-GI-TOC-March-2026.pdf (noting armed groups' use of "civilians as human

shields," which puts them at risk of "becoming part of gangs' warfare strategy – used simultaneously as camouflage and as defensive infrastructure"); *see also* BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April–June 2026)*, pp. 15-16 (Aug. 25, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Q2%202026%20-%20EN-V3.pdf (reporting 81 cases between April and June 2026, most in the West and Artibonite Departments, representing a 42% increase from the previous quarter); Likenton Joseph, *La POHDH publie son premier rapport trimestriel sur la situation des droits humains en Haïti*, Le National (Aug. 7, 2026), https://www.lenational.org/article/politique/8245/la-pohdh-publie-son-premier-rapport-trimestriel-sur-la-situation-des-droits-humains-en-haiti; Jacqueline Charles, *Two Koreans are rescued in Haiti as kidnappings by armed groups continue*, Miami Herald (Sep. 3, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317114566.html (two South Korean nationals "are among a growing number of people who have been abducted in recent months as for-ransom kidnappings remain a persistent threat as armed groups continue to expand their terriroties").

[96] GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ (the leader of the armed group "threatened to execute the hostages [in a video on social media], including the children, if security forces hit back, saying: 'If any of our soldiers are hurt, I will kill all of them'"); Dánica Coto & Evens Sanon, *Haiti struggles with rise in kidnappings as general election looms*, Washington Post (Oct. 1, 2026), https://www.washingtonpost.com/world/2026/10/01/haiti-kidnappings-gangs-force/20054300-bdb4-11f1-81fc-9b76f8343b6c_story.html; UN Geneva, *UN Geneva Press Briefing*, (Aug. 28, 2026), https://www.ungeneva.org/en/news-media/press-briefing/2026/08/un-geneva-press-briefing-2; Pierre-Richard Luxama, Dánica Coto & Evens Sanon, *More than 50 kidnapped as violent gang attack in Haiti leaves 47 dead*, Associated Press (Aug. 25, 2026), https://apnews.com/article/1690b1523421eb72aa260d9d56b5d521. According to information shared by Rosy Auguste Ducéna, 13 of the captives were released following intervention from UNICEF and the *Zon Pa Fè Moun* Foundation. Some were subsequently set free following police operations during which their captors fled. Others never returned home. According to their relatives, they were likely killed during these operations, which were supported by strikes using kamikaze drones. (Notes on file with authors). *See also* UNICEF, *UNICEF welcomes the release of women and children in Kenscoff and calls for stronger protection of children in Haiti* (Aug. 29, 2026), https://www.unicef.org/haiti/en/press-releases/unicef-welcomes-release-women-and-children-kenscoff-and-calls-stronger-protection-0 (noting the release of seven women and six children).

[97] Wedster Lyvert, *Gangs Free Hundreds of Hostages in Exchange for the Release of Their Associates*, Le Nouvelliste (Sep. 28, 2026), https://lenouvelliste.com/en/article/272384/gangs-free-hundreds-of-hostages-in-exchange-for-the-release-of-their-associates (human rights defender Bertide Horace said the hostages were "male and female farmers who were either heading to or returning from the Pont-Sondé market, as they do every Saturday") (*internal quotations omitted*); Dánica Coto & Evens Sanon, *Haiti struggles with rise in kidnappings as general election looms*, Washington Post (Oct. 1, 2026), https://www.washingtonpost.com/world/2026/10/01/haiti-kidnappings-gangs-force/20054300-bdb4-11f1-81fc-9b76f8343b6c_story.html ("At least eight people were killed and 10 others injured. . . . trying to escape.") (*internal quotations omitted*).

[98] Dánica Coto & Evens Sanon, *Haiti struggles with rise in kidnappings as general election looms*, Washington Post (Oct. 1, 2026), https://www.washingtonpost.com/world/2026/10/01/haiti-kidnappings-gangs-force/20054300-bdb4-11f1-81fc-9b76f8343b6c_story.html (police inspector general and cabinet director of Haiti's Defense Ministry James Boyard was kidnapped in June, and director general of Haiti's National Office for Educational Partnerships Stéphanie Paultre was kidnapped in September); Alterpresse, *Haïti-Artibonite-Violences : Plus d'une centaine de victimes en un mois et demi, l'action de la Frg toujours attendue* (Sep. 18, 2026), https://www.alterpresse.org/Haiti-Artibonite-Violence-Plus-d-une-centaine-de-victimes-en-un-mois-et-demi-l-action-de-la-FRG-toujours-attendue (two police officers were kidnapped alongside Paultre in September); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April–June 2026)*, p. 16 (Aug. 25, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Q2%202026%20-%20EN-V3.pdf (noting the kidnapping of senior government officials, the family member of a former government representative, and off-duty police officers); Le Nouvelliste, *Kidnapping : libération du professeur Ecclésiaste Télémaque* (Aug. 10, 2026), https://lenouvelliste.com/article/270795/kidnapping-liberation-du-professeur-ecclesiaste-telemaque (reporting the kidnapping of Education Ministry chief of staff on July 24 in Delmas 31, and his release approximately two weeks later); Jacqueline Charles, *Abduction of Haiti security official, 6-year-old daughter shows kidnapping crisis*, The Spokesman-Review (Jun. 14, 2026), https://www.spokesman.com/stories/2026/jun/14/abduction-of-haiti-security-official-6-year-old-da/ (armed groups kidnapped "a senior staffer in the Foreign Affairs Ministry who was freed after spending more than a month in captivity and the payment of a hefty ransom;" in May, they also kidnapped two foreign nationals from a cargo ship in the Bay of Port-au-Prince).

[99] OHCHR, *High Commissioner Türk: We need all eyes on Haiti* (Oct. 2, 2026), https://www.ohchr.org/en/statements-and-speeches/2026/10/high-commissioner-turk-we-need-all-eyes-haiti.

[100] OHCHR, *High Commissioner Türk: We need all eyes on Haiti* (Oct. 2, 2026), https://www.ohchr.org/en/statements-and-speeches/2026/10/high-commissioner-turk-we-need-all-eyes-haiti; Dánica Coto & Evens Sanon, *Haiti struggles with rise in kidnappings as general election looms*, Washington Post (Oct. 1, 2026), https://www.washingtonpost.com/world/2026/10/01/haiti-kidnappings-gangs-force/20054300-bdb4-11f1-81fc-9b76f8343b6c_story.html ("Most Haitians do not report abductions of loved ones because they fear reprisals, higher ransoms or disrupting ongoing negotiations with kidnappers."); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 136, 140, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April–June 2026)*, p. 15 (Aug. 25, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Q2%202026%20-%20EN-V3.pdf ("These figures represent only a portion of the total number of people kidnapped. In many cases, victims' relatives do not report kidnappings to the police or service providers and choose to negotiate directly with the kidnappers, believing that this approach allows for a quicker release and avoids possible reprisals."); POHDH, *Bilan semestriel : Crise de gouvernance renforcée et détérioration des conditions socioéconomiques, la POHDH dresse le bilan des six premiers mois de l'année 2026*, p. 7 (Jul. 2026), https://pohdh-ht.org/media/documents/BILAN_SEMESTRIEL_POHDH_juillet_2026.pdf (explaining that kidnappers pressure victims' families not to report, which creates difficulties in accessing information about kidnappings).

[101] Dánica Coto & Evens Sanon, *Haiti struggles with rise in kidnappings as general election looms*, Washington Post (Oct. 1, 2026), https://www.washingtonpost.com/world/2026/10/01/haiti-kidnappings-gangs-force/20054300-bdb4-11f1-81fc-9b76f8343b6c_story.html ("[C]riminal groups are using official or cloned police uniforms, vehicles and license plates to carry out kidnappings, and . . . some law enforcement agents are [allegedly] involved."); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 136, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; Jacqueline Charles, *Abduction of Haiti security official, 6-year-old daughter shows kidnapping crisis*, Miami Herald (Jun. 14, 2026), https://www.spokesman.com/stories/2026/jun/14/abduction-of-haiti-security-official-6-year-old-da/ ("Victims . . . are not reporting their abductions and instead choose to flee after being released. The reason is because they do not have confidence in the police, and increasing there are reports that gunmen are dressing as police officers and using police vehicles."); *see also* note 162.

[102] BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April–June 2026)*, pp. 15–16 (Aug. 25, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Q2%202026%20-%20EN-V3.pdf (noting that victims are kidnapped in the street, while traveling in private and public vehicles, at work, and at home); Caitlin Stephen Hu & Etant Dupain, *In the city where Haitian deportees are being sent, locals say they're not ready*, CNN (Aug. 21, 2026), https://kesq.com/news/national-world/cnn-world/2026/08/21/in-the-city-where-haitian-deportees-are-being-sent-locals-say-theyre-not-ready/ ("[T]he country's kidnapping epidemic has been overwhelmingly felt by Haitians, with gangs notorious for taking victims from among even the very poor."); Médecins Sans Frontières USA, Inc., *Brief of Médecins Sans Frontières USA, Inc. d/b/a Doctors Without Borders USA as Amicus Curiae in Support of Respondents*, p. 8, Trump v. Miot, No. 25A999 (U.S. Mar. 16, 2026), https://www.supremecourt.gov/DocketPDF/25/25A999/401039/20260316232653882_MSF%20-%20Miot%20SCOTUS%20Amicus%20Brief%20---%20to%20file.pdf ("[T]he threat of ransom kidnapping is particularly high for persons who have spent time in the United States; armed groups perceive returnees as having access to substantial amounts of money and specifically single them out as targets for threats and violence."); *see also* note 413.

[103] Global Protection Cluster, *Haiti: Protection Analysis Update*, pp. 7, 15 (Sep. 24, 2026), https://globalprotectioncluster.org/sites/default/files/2026-09/PAU26_10_Protection_Analysis_Update_Haiti_Sep%202026.pdf (documenting physical and sexual violence during captivity, including nine women and four girls raped after a June attack in Belekou, and video calls used to pressure families and accelerate ransom negotiations); Dorly Castaneda & María Antonia Cote, *Sexual and gender-based violence as a tool of criminal governance in Haiti: Three lessons from Colombia's civil war*, GI-TOC (Sep. 18, 2026), https://globalinitiative.net/analysis/sexual-and-gender-based-violence-as-a-tool-of-criminal-governance-in-haiti/; Rezo Nòdwès, *Haïti – Kidnapping | Me Caleb Jean-Baptiste menacé d'exécution : les gangs réclameraient encore 286 000 dollars sur une rançon de 600 000 dollars* (Sep. 16, 2026), https://rezonodwes.com/2026/09/haiti-kidnapping-me-caleb-jean-baptiste-menace-dexecution-les-gangs-reclameraient-encore-286-000-dollars-sur-une-rancon-de-600-000-dollars/ (reporting that kidnappers threatened to execute a lawyer they had abducted over what they claimed was an outstanding balance on a $600,000 ransom demand); U.S. Department of State, *Haiti Travel Advisory* (Jul. 10, 2026), https://travel.state.gov/en/international-travel/travel-advisories/haiti.html ("U.S. citizen victims of kidnapping have been hurt or killed."); Pierre-Richard Luxama, Dánica Coto & Evens Sanon, *More than 50 kidnapped as violent gang attack in Haiti leaves 47 dead*, Associated Press (Aug. 25, 2026), https://apnews.com/article/1690b1523421eb72aa260d9d56b5d521 (a 16-year-old girl was abducted and raped during the August Kenscoff attack); *see also* UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 138, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("[R]ansom amounts commonly paid often range between $5,000 and $25,000" depending on the victim's wealth, although the amounts demanded are often much higher than what is paid, up to $1.5 million); U.S. Department of State, *Haiti Travel Advisory* (Jul. 10, 2026), https://travel.state.gov/en/international-travel/travel-advisories/haiti.html (describing ransom demands in the "tens of thousands to hundreds of thousands of dollars").

[104] *See, e.g.*, BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, pp. 10-11 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026.

[105] GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ ("The [August 2026 Kenscoff] attack highlighted a long-standing issue: despite the reinforcement of Haitian security forces, criminal groups still retain the capacity to attack at will. . . . The gangs' expansion has been enabled by a structural weakness in the response: forces lack the numbers, training and equipment to confront dispersed, highly mobile armed actors across rural and mountainous terrain."); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 25, 138, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("Although security operations appear more coordinated and bolstered by increased logistical capacities . . . the Haitian National Police continues to face the same challenges previously reported by the Panel: an insufficient number of personnel, limited equipment, human rights abuses and corruption issues;" for example, the PNH Anti-Kidnapping Cell faces a "lack of phone tracking devices and vehicles for tracking victims, as well as an insufficient number of trained negotiators"); RNDDH, *Situation préoccupante sur l'île de La Gonâve : Le RNDDH presse le CSPN et le CSPJ d'intervenir*, ¶¶ 7-9, 12, 61 (Aug. 17, 2026), https://web.rnddh.org/situation-preoccupante-sur-lile-de-la-gonave-le-rnddh-presse-le-cspn-et-le-cspj-dintervenir/?lang=en (police stations on the island of Gonâve lack radios, transportation, ledgers, tables, chairs, and filing cabinets, and are seriously understaffed; "the numerous requests made to state authorities have gone unanswered, as the authorities have chosen to retain all equipment for their own operations"); National Human Rights Defense Network (RNDDH), *31st Anniversary of the PNH: Report on the General Operating Conditions of the Institution from June 2025 to June 2026*, ¶¶ 8–9, 11, 25, 27, 33, 36 (Jun. 12, 2026), https://web.rnddh.org/wp-content/uploads/2026/06/5-Rap-PNH-12Juin2026.ENG_.pdf (finding persistent staffing, equipment and transport shortages despite assistance; RNDDH specifically identified inadequate radios, weapons, protective equipment, and functioning vehicles, which limit police capacity to carry out patrols and respond to armed group activities); *see also* U.S. Department of State, *Haiti*, https://travel.state.gov/en/international-travel/travel-advisories/haiti.html (last visited Oct. 20, 2026) ("Local law enforcement has an extremely limited ability to respond to serious crimes, particularly outside Port-au-Prince and Cap-Haitien.").

[106] *See, e.g.*, Le Nouvelliste, *More than 30 police officers certified by the French embassy after specialized training* (Sep. 26, 2026), https://www.lenouvelliste.com/en/article/272353/more-than-30-police-officers-certified-by-the-french-embassy-after-specialized-training; UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 20 (Apr. 28, 2026),

https://docs.un.org/en/A/HRC/61/74; RNDDH, *31st Anniversary of the PNH: Report on the General Operating Conditions of the Institution from June 2025 to June 2026*, ¶¶ 15-20 (Jun. 12, 2026), https://web.rnddh.org/wp-content/uploads/2026/06/5-Rap-PNH-12Juin2026.ENG_.pdf; *see also* Russel L. Honoré, *Haiti Is a War Zone. Why Are We Banishing Our Neighbors There?*, New York Times (Jul. 23, 2026), https://www.nytimes.com/2026/07/23/opinion/trump-haiti-tps-immigration.html?smid=nytcore-ios-share (former commanding general of the U.S. First Army, Lt. Gen. Honoré, says U.S. assistance is complicated "[b]ecause of restrictions such as the Leahy Law, which bars U.S. assistance to foreign security units credibly implicated in human rights violations, [which prevent] even vetted Haitian forces . . . from receiving the critical equipment and support they require").

[107] The Haitian Armed Forces have a long history of being used as tools of political violence and were disbanded in 1995 before being reconstituted in 2024 as part of a so-called "integrated security strategy" to combat the armed groups. *See* IJDH, *Human Rights Update – December 2024*, note 124 (Dec. 2024), https://www.ijdh.org/wp-content/uploads/December-2024-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf.

[108] *See* National Human Rights Defense Network (RNDDH), *Massacres à Kenscoff en juillet et en août 2026 : Le CSPN livre la population haïtienne sans protection ni défense*, ¶ 139 (Sep. 16, 2026), https://web.rnddh.org/wp-content/uploads/2026/09/7-Rap-Situation-DH-Kenscoff-16Sept2026.pdf (noting that despite the FAd'H consuming "a significant potion of public resources," just one FAd'H contingent was assigned to protect the Téléco telecommunications base during the August 2026 Kenscoff attacks, "with no significant involvement in efforts to protect the population and contain the advance of armed gangs"); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 26, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (noting "a shift in the approach to the national armed forces," with increased government investment into "recruitment, procurement of equipment, training programmes and the project to develop a new military doctrine"); Roobens Isma, *Army Chief Derby Guerrier Says Gangs Are Sometimes Better Armed Than Security Forces*, Le Nouvelliste (Aug. 24, 2026), https://lenouvelliste.com/en/article/271245/army-chief-derby-guerrier-says-gangs-are-sometimes-better-armed-than-security-forces (the FAd'H Commander-in-Chief acknowledged that the army and the PNH are "struggling to contain" the armed groups; his remarks contained "barely veiled requests for stronger material resources and equipment" and greater autonomy).

An initiative started under the previous transitional government to incorporate the Protected Areas Security Brigade (**BSAP**) – a government agency-turned-paramilitary group that, since at least January 2024, has been operating largely outside the law – into the armed forces has been scrapped. Instead, the current government has taken steps to bring BSAP further under its control without explicitly integrating it into its national security forces by creating a registration system, putting members on the government payroll, and establishing a training program. However, Haitian authorities have acknowledged that BSAP "could, if requested, fight alongside the Police forces to protect lives and property." LLM, *Les agents de la BSAP bientôt rémunérés par l'État*, Radio Métropole (Aug. 28, 2026), https://metropole.ht/les-agents-de-la-bsap-bientot-remuneres-par-letat/. According to information shared by Haitian human rights organization *Ordre des Défenseurs des Droits Humains* (**ORDEDH**), training and state financial support, effective integration, and strict institutional oversight of BSAP personnel remain incomplete on the ground. (Notes on file with authors). BSAP is formally a government agency supposed to operate under the umbrella of the Haitian Environment Ministry, officially tasked with protecting environmentally sensitive areas. 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." Many Haitians identify BSAP "as a primary threat to the stability of the country." UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2700 (2023)*, ¶¶ 53, 65, 83-85, UN Doc. S/2024/704* (Sep. 30, 2025), https://docs.un.org/en/S/2024/704; *see also* UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 39, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (noting the involvement of BSAP agents alongside armed groups in land grabs in the North Department); IJDH, *Human Rights Update – June 2024*, notes 17, 49 and associated text (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. The current "restructuring," at a time when the government has proven unable or unwilling to address credible allegations of corruption and collusion with armed groups within the entities already under its control (*see* Section III), raises serious questions around accountability, particularly given BSAP's history of abuses against the population.

[109] International Crisis Group's Haiti analyst said that the overall force is around 10,000, which reflects the addition of about 2,000 officers that were recruited through the P4000 program, which aims to add 4,000 officers by April 2027. Various U.S. government sources put the number at between 10,000 and 13,000. *See* U.S. Department of State, *2026 Trafficking in Persons Report: Haiti* (2026), https://www.state.gov/reports/2026-trafficking-in-persons-report/haiti/ (reporting around 10,000 officers, only about 400 of whom are "actively engaged in efforts to counter criminal gangs in Port-au-Prince"); U.S. Department of State, *Report to Congress on The Security Situation in Haiti Section 7019(e) of the National Security, Department of State, and Related Programs Appropriations Act, 2026 (Div. F, P.L. 119-75) and House Report 119-217*, pp. 1-2 (Sep. 11, 2026), https://www.state.gov/wp-content/uploads/2026/09/Report-to-Congress-on-The-Security-Situation-in-Haiti-2026-HRC1519287-Accessible-9.11.2026.pdf; *see also* RNDDH, *31st Anniversary of the PNH: Report on the General Operating Conditions of the Institution from June 2025 to June 2026*, ¶ 8 (Jun. 12, 2026), https://web.rnddh.org/wp-content/uploads/2026/06/5-Rap-PNH-12Juin2026.ENG_.pdf ("[T]he PNH also continued, throughout the period under review, to face a shortage of personnel, a shortage aggravated by the losses recorded within the ranks of police officers as well as by the numerous departures of officers of the institution for foreign countries").

[110] The analyst, Diego Da Rin, noted that the PNH has been reluctant to share figures on combat-ready officers, as these could highlight the force's limited capacity to face the armed groups. With BINUH no longer mandated to provide official police numbers, there is no independent verification of any numbers that the PNH does provide.

[111] National Human Rights Defense Network (RNDDH), *Massacres à Kenscoff en juillet et en août 2026 : Le CSPN livre la population haïtienne sans protection ni défense*, ¶ 144 (Sep. 16, 2026), https://web.rnddh.org/wp-content/uploads/2026/09/7-Rap-Situation-DH-Kenscoff-16Sept2026.pdf (noting that this practice forces the PNH "to adopt a reactive approach to managing its human resources, responding to emergencies and as needs arise" and continually reassigning officers "at the expense of coherent and sustainable planning for the deployment of personnel"); *see also* UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 31, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (reporting the

involvement of "former and current senior government officials and officers of the Haitian National Police" in Haiti's private security sector).

[112] RNDDH, *31st Anniversary of the PNH: Report on the General Operating Conditions of the Institution from June 2025 to June 2026*, ¶¶ 8, 22-25, 38 (Jun. 12, 2026), https://web.rnddh.org/wp-content/uploads/2026/06/5-Rap-PNH-12Juin2026.ENG_.pdf ("[W]hile it is true that expectations regarding the P-4000 project are enormous, without the granting of pay that reflects the high cost of living and of solid social protection that takes into account the dangerous nature of the work of PNH officers and includes social benefits for all officers, and not only for the institution's leadership, this staffing problem will only be solved temporarily."); U.S. Department of State, *Report to Congress on The Security Situation in Haiti Section 7019(e) of the National Security, Department of State, and Related Programs Appropriations Act, 2026 (Div. F, P.L. 119-75) and House Report 119-217*, p. 4 (Sep. 11, 2026), https://www.state.gov/wp-content/uploads/2026/09/Report-to-Congress-on-The-Security-Situation-in-Haiti-2026-HRC1519287-Accessible-9.11.2026.pdf (as of September, 2,070 officers had graduated the training and an addition 1,200 had started); Dánica Coto & Evens Sanon, *Haiti struggles with rise in kidnappings as general election looms*, Washington Post (Oct. 1, 2026), https://www.washingtonpost.com/world/2026/10/01/haiti-kidnappings-gangs-force/20054300-bdb4-11f1-81fc-9b76f8343b6c_story.html (according to Prime Minister Fils-Aimé, "4,000 new police officers were being trained this year, with another 1,500 soldiers already completing training, for a total of 15,000 new soldiers in the next three years").

[113] RNDDH, *31st Anniversary of the PNH: Report on the General Operating Conditions of the Institution from June 2025 to June 2026*, ¶¶ 25-26, 28-31, 34 (Jun. 12, 2026), https://web.rnddh.org/wp-content/uploads/2026/06/5-Rap-PNH-12Juin2026.ENG_.pdf (insufficient government funding means that "officers do not have sufficient materials and equipment to mitigate the risks to which they are exposed during operations;" also reporting that 41 police stations and substations and at least 6 police outposts "have been partially or completely razed by armed bandits, or decommissioned by State authorities"); *see also* UN HRC, *Situation of Human Rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 20 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (as of January 2026, 79 out of 413 police stations were non-operational and 50 out of 116 armored vehicles were either non-operational, destroyed, or in the possession of armed groups).

[114] GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ ("Even if gangs are forced, or choose, to withdraw, police forces are often unable to maintain a lasting presence, allowing them to return on their own terms. Each incursion broadens the space in which criminal groups can operate freely. This explains why the recent efforts of the Haitian National Police and the anti-gang task force, supported by private military contractor Vectus Global, have struggled to produce lasting results. In May, for instance, the police dismantled several gang checkpoints near L'Estère and La Croix-Périsse in the Artibonite. Within days they were reinstalled, slightly further away."); Jacqueline Charles, *U.N. Security Council renews gang-fighting force for Haiti amid fresh attacks*, Miami Herald (Sep. 29, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317423130.html ("[W]hile security operations have disrupted gang activities and inflicted losses, the gangs retain the ability to recruit, adapt and re-establish positions in contested areas."); Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees ("Haitian security forces pushed gangs out of several Port-au-Prince neighborhoods between late 2025 and February 2026. But many gangs regrouped in the Plaine du Cul-de-Sac, the corridor carrying commercial traffic to the capital's container port and oil terminal, then turned on the gangs already there."); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 20, 37, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (despite "the recovery of some areas from gang control in the capital. . . . gains remain fragile[,] . . . national roads connecting the capital to the rest of the country remain under gang control[,]. . . . [and armed groups] have managed to reoccupy areas that had previously been cleared by security forces, such as Bel-Air"); Reuters, *Haiti gang retaliation leaves at least 11 dead after security operation* (Sep. 28, 2026), https://www.reuters.com/world/americas/haiti-gang-retaliation-leaves-least-11-dead-after-security-operation-2026-09-29/ (reporting that armed group members returned to an area that they were pushed out of by a GSF unit in the Artibonite Department the very same day; the GSF unit "only stayed in the area for a few hours, before returning to the town of Gonaives where they are based"); National Human Rights Defense Network (RNDDH), *31st Anniversary of the PNH: Report on the General Operating Conditions of the Institution from June 2025 to June 2026*, ¶ 6 (Jun. 12, 2026), https://web.rnddh.org/wp-content/uploads/2026/06/5-Rap-PNH-12Juin2026.ENG_.pdf (frequent clashes between armed groups and police "mobiliz[e] a considerable share of the PNH's human and logistical resources and just as considerably reduc[e] the institution's capacity to carry out its public security missions effectively and to intervene rapidly in other areas facing insecurity"); LLM, *Le chef de la Police promet d'intensifier l'offensive contre les gangs*, Radio Métropole (Apr. 11, 2026), https://metropole.ht/le-chef-de-la-police-promet-dintensifier-loffensive-contre-les-gangs/ (PNH director general Paraison acknowledges that "[d]ue to limited personnel, [the PNH is] . . . unable to conduct the sustained operations essential for capturing gang leaders"); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 14, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("Intensified security efforts by Haitian authorities, alongside nearly a year of drone strikes enabled by international private contractors, and the actions of self defence groups, have slowed the advance of gangs in the capital. Security gains remain, however, fragile and risk reversal without sustained pressure. No gang controlled territory has been fully retaken by security forces, kidnappings have notably risen in the Delmas area of the capital, and key gang leaders remain at large."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 20 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("[T]he police still face multiple challenges, including insufficient capacity to deter, arrest and disarm armed gangs – many of which possess superior equipment – as well as difficulties maintaining a sustained presence and control in areas from which gangs have been expelled."); *see also* Rhinews, *Saint-Michel-de-l'Attalaye : une attaque armée à Marmont fait au moins un mort et trois blessés par balles…* (Sep. 16, 2026), https://www.rhinews.com/actualites/saint-michel-de-lattalaye-une-attaque-armee-a-marmont-fait-au-moins-un-mort-et-trois-blesses-par-balles/ (police efforts in Saint-Michel-se-l'Attaye are hampered by infrastructure issues that prevent the use of armored vehicles, even as "armed incursions are repeated in the different localities of the municipality").

[115] *See* GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ (advanced

warnings about the armed group attack in the Artibonite Department at the end of March 2026 had circulated on WhatsApp); National Human Rights Defense Network (RNDDH), *Massacres à Kenscoff en juillet et en août 2026 : Le CSPN livre la population haïtienne sans protection ni défense*, ¶ 17 (Sep. 16, 2026), https://web.rnddh.org/wp-content/uploads/2026/09/7-Rap-Situation-DH-Kenscoff-16Sept2026.pdf (rumors about a second attack in Kenscoff began circulating in late July, prompting the then-chief of the Kenscoff Police Station to send two requests to higher-ups for reinforcements; both were ignored and "no security measures were taken to prevent the armed attack carried out on the night of August 23–24, 2026"); Francklyn B. Geffrard, *Kenscoff : six jours avant le massacre, l'inspecteur de police Nickenson Cadet avait alerté sa hiérarchie sur les failles du dispositif sécuritaire…*, Rhinews (Sep. 2, 2026), https://www.rhinews.com/actualites/kenscoff-six-jours-avant-le-massacre-le-commissaire-nickenson-cadet-avait-alerte-sa-hierarchie-sur-les-failles-du-dispositif-securitaire/; Jacqueline Charles, *They came in silence: Why killings, abductions in Haiti mountain town have U.N. worried*, Miami Herald (Aug. 28, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317045603.html (noting that the August 2026 Kenscoff attack "demonstrates the continued capacity and determination of gangs to terrorize the population, expand their influence beyond the capital and pose a direct challenge to state authority and the rule of law"); Pierre-Richard Luxama, Dánica Coto & Evens Sanon, *More than 50 kidnapped as violent gang attack in Haiti leaves 47 dead*, Associated Press (Aug. 25, 2026), https://apnews.com/article/haiti-kenscoff-gangs-killed-kidnapped-attack-1690b1523421eb72aa260d9d56b5d521 (the August Kenscoff attack exposed the disconnect between the government's claims of protection and the reality; for example, the PNH rejected claims from Kenscoff residents that it did not provide enough protection before the attack, begging the question: "You let the gangs come in even if you had everything in place?") (*internal quotations omitted*).

[116] RNDDH, *Massacres à Kenscoff en juillet et en août 2026 : Le CSPN livre la population haïtienne sans protection ni défense*, ¶¶ 9-13 (Sep. 16, 2026), https://web.rnddh.org/wp-content/uploads/2026/09/7-Rap-Situation-DH-Kenscoff-16Sept2026.pdf.

[117] GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ (armed groups' expansion into mountainous areas, use of scouts and surveillance drones, and maintenance of "dispersed cells of roughly a dozen men, capable of acting at short notice," give them a tactical advantage: PNH "personnel are not trained to operate in rural or mountainous areas" and "every reinforcement results in a thinning of resources elsewhere, a challenge made more acute by the effectiveness of the gangs' highly mobile operating model"); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 138, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("[G]angs continuously change their kidnapping tactics, making it difficult for the specialized [PNH Anti-Kidnapping] cell to detect and prevent such occurrences."); Pierre-Richard Luxama, Dánica Coto & Evens Sanon, *More than 50 kidnapped as violent gang attack in Haiti leaves 47 dead*, Associated Press (Aug. 25, 2026), https://apnews.com/article/haiti-kenscoff-gangs-killed-kidnapped-attack-1690b1523421eb72aa260d9d56b5d521 (according to GI-TOC's Romain Le Cour, the aim of the August Kenscoff attack "could be to force Haiti's police and the U.N.-backed gang suppression force to disperse even more of their limited resources"); LLM, *Le chef de la Police promet d'intensifier l'offensive contre les gangs*, Radio Métropole (Apr. 11, 2026), https://metropole.ht/le-chef-de-la-police-promet-dintensifier-loffensive-contre-les-gangs/ ("While specialized [PNH] units close in to dismantle a gang, other units launch simultaneous offensives. Law enforcement is thus fighting on more than 25 fronts across the country."); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 55-56, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("Gangs are increasingly using various tactics that emulate police operations in order to conceal their identity. They impersonate Haitian National Police officers by wearing uniforms, bullet-proof vests and tactical equipment and using Police-branded patrol cars with fake plate numbers, enabling them to move freely. They are able to access even the green zone of Pétion-Ville to conduct surveillance and commit crimes. This can jeopardize police operations, as it can be difficult to differentiate the genuine police from gang impersonators.").

[118] *See* Michelson Césaire, *Justice in Lost Territory: Several Peace Courts at a Standstill*, Le Nouvelliste (Sep. 17, 2026), https://lenouvelliste.com/en/article/272016/justice-in-lost-territory-several-peace-courts-at-a-standstill ("[t]he presence of the State . . . has completely disappeared" in Carrefour and Croix-des-Bouquets, which are under the complete control of armed groups); *see also* notes 71-74.

[119] *See, e.g.*, Amnesty International, *Haiti: Attack in Artibonite underscores the urgent need to turn international commitments into effective protection* (Sep. 30, 2026), https://www.amnesty.org/en/latest/news/2026/09/haiti-ataque-en-artibonite-demuestra-la-urgencia-de-convertir-los-compromisos-internacionales-en-proteccion-efectiva/ (reporting a deadly attack in Gros-Morne by the *Kokorat san ras* armed group, allegedly in retaliation for an intervention by the GSF that injured three armed group members); Reuters, *Haiti gang retaliation leaves at least 11 dead after security operation* (Sep. 28, 2026), https://www.reuters.com/world/americas/haiti-gang-retaliation-leaves-least-11-dead-after-security-operation-2026-09-29/; BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 10 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting a deadly attack in Kenscoff in April allegedly in retaliation for a police operation in the area).

[120] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 22-23, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; UN Secretary-General, *Letter dated 14 July 2026 from the Secretary-General addressed to the President of the Security Council*, ¶ 12, UN Doc. S/2026/578 (Jul. 28, 2026), https://docs.un.org/en/S/2026/578.

[121] Prince's former private security firm Blackwater has a long record of human rights abuses. Daniela Mohor, *In Depth: Haiti's New Gang Suppression Force — What It Means for Haiti*, The New Humanitarian (Dec. 3, 2025), https://www.thenewhumanitarian.org/analysis/2025/12/03/haiti-depth-new-gang-suppression-force-what-it-means-haiti.

[122] According to a report by the Fondasyon Je Klere (**FJKL**), Windward Wyoming LLC – a company managed by Prince (Aram Roston & Lisa Barrington, *EXCLUSIVE Blackwater founder Prince takes role in COVID vaccine venture*, Reuters (Jun. 4, 2021), https://www.reuters.com/business/healthcare-pharmaceuticals/exclusive-blackwater-founder-prince-takes-role-covid-vaccine-venture-2021-06-04/) – has a US$52 million one-year contract to provide technical support to the PNH. The Haitian government has not confirmed this. FJKL, *Liquidation de la souveraineté nationale via des contrats léonins : La Fondasyon Je Klere (FJKL)*

crie au scandale, ¶¶ 37-55 (Mar. 2026), https://docs.google.com/document/d/1fyau3xLmrs-xd6QpCX3Lpr3IN6FYmgJLFTGKy0KLrKE/edit?tab=t.0.

[123] Vectus Global, which is led by Prince, recently renewed a one-year contract to assist "security operations through helicopter support, drone strikes and ground engagement." Evergreen Trading System Ltd., which also has ties to Prince, has a 10-year contract to support "for border security reinforcement and customs revenue optimization." UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 27-28, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; FJKL, *Liquidation de la souveraineté nationale via des contrats léonins : La Fondasyon Je Klere (FJKL) crie au scandale*, ¶¶ 27-36 (Mar. 2026), https://docs.google.com/document/d/1fyau3xLmrs-xd6QpCX3Lpr3IN6FYmgJLFTGKy0KLrKE/edit?tab=t.0; Jacqueline Charles & Shirsho Dasgupta, *Amid looming election questions, silence on TPS, Haiti hires Trump operative to lobby*, Miami Herald (Sep. 22, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317336729.html (noting that Haitian authorities have not acknowledged the link between Prince and the 10-year border security contract); *see also* note 151.

[124] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 23, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; Harvard Law School International Human Rights Clinic, *The New Humanitarian Actors: Politicization, Corporization, & Militarization in the Aid Sector*, p. 11 (Jun. 2026), https://humanrightsclinic.law.harvard.edu/wp-content/uploads/2026/06/New-Humanitarian-Actors-Politicization-Corporatization-Militarization-in-the-Aid-Sector-060326.2.pdf ("The scope of Vectus' security mandate places it in a role functionally analogous to humanitarian security missions traditionally undertaken by UN-authorized forces or multilateral peace operations, albeit absent a clear civilian protection mandate. This security model raises structural accountability concerns similar to those seen in the humanitarian sector: Private contractors exercising force blurs chains of command, complicates transparency, and impedes effective remedies for wrongful deaths, arbitrary use of force, or unlawful detention.").

[125] Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees ("It is unclear how this [drone] offensive is improving security in Port-au-Prince and Haiti overall, or achieving U.S. strategic goals. . . . The gang leader Barbecue's Port-au-Prince stronghold was bombed by drones in January to no effect. He remains at large, and no major gang leader has been captured or killed."); Jean Ryl Antenor, *Haiti, Erik Prince, and the cost of privatized security*, Foreign Policy in Focus (Sep. 2, 2026), https://fpif.org/haiti-erik-prince-and-the-cost-of-privatized-security/ (comparing promises by Prince made in 2025 to "regain control of major roads and territory from gangs within approximately one year" with the current situation, and raising concerns about the lack of transparency and accountability regarding the use of drones); Sophie Rutenbar, *Another gang suppression force may win battles, yet lose Haiti's deeper war*, Miami Herald (Apr. 6, 2026), https://www.miamiherald.com/opinion/op-ed/article315290165.html ("[S]ince March 2025, the Haitian National Police has been using increasingly heavy-handed tactics, including indiscriminate attacks by explosive-laden drones. But although Haitian authorities have killed more than 1,200 alleged gang members over the past year, they have not arrested or taken out a single gang leader."); Harvard Law School International Human Rights Clinic, *The New Humanitarian Actors: Politicization, Corporization, & Militarization in the Aid Sector*, p. 10 (Jun. 2026), https://humanrightsclinic.law.harvard.edu/wp-content/uploads/2026/06/New-Humanitarian-Actors-Politicization-Corporatization-Militarization-in-the-Aid-Sector-060326.2.pdf ("Human rights observers have concluded that these . . . [drone strikes] amount to extrajudicial killings in violation of international human rights law."); Jonasson Odigène, *"The PNH Does Not Have Drones Equipped with Explosive Charges," Says Vladimir Paraison*, Le Nouvelliste (Apr. 8, 2026), https://lenouvelliste.com/en/article/266090/the-pnh-does-not-have-drones-equipped-with-explosive-charges-says-vladimir-paraison (PNH director general Vladimir Paraison claims that the PNH does not have drones and that the task force is not using them, but could not answer whether private security companies were using them; however, according to previous reporting by Human Rights Watch (**HRW**) and Prince's own statements, Vectus Global is using drones); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April–June 2026)*, p. 14 (Aug. 25, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Q2%202026%20-%20EN-V3.pdf (reporting that the task force is conducting drone attacks); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 6 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (noting that some of the task force operations "involved both the national security forces and the private military company, while others were led solely by the company"); Widlore Mérancourt, *Foreign Agents Targeted in Port-au-Prince*, AyiboPost (Apr. 28, 2026), https://backoffice.ayibopost.com/foreign-agents-targeted-in-port-au-prince/ (reporting an incident in which police officers fired on a vehicle carrying task force personnel and related concerns about the lack of clarity around "[t]he task force's responsibilities, its communication channels with Haitian institutions, and its accountability mechanisms"); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 16-18, 20, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 (noting that many Haitian stakeholdrs perceive "the fact that all top gang leaders remain at large . . . as a shortcoming of security operations and linked with broader political dynamics, including tacit arrangements with gangs, ahead of elections," and that the armed groups "have leveraged collateral damage from drone strikes . . . to strengthen their local control").

[126] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 32, 40, 108, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("Self-defence groups have continued to strengthen and multiply throughout the reporting period. . . . In the West Department, they are often led by or include Haitian National Police officers who reside in the communities they protect; in more rural areas such as the lower Artibonite, several groups have been coordinating closely with Haitian National Police operations as well as some units of the Protected Areas Security Brigade. . . . [M]any members are involved in criminal activities, remain illegally armed and funded and risk perpetuating cycles of violence by contributing to the next generation of gangs."); Widlore Mérancourt, *They formed to fight Haiti's gangs. Now they're an obstacle to peace*, Washington Post (Sep. 7, 2026), https://www.washingtonpost.com/world/2026/09/07/they-formed-fight-haitis-gangs-now-theyre-an-obstacle-peace/ (on the one hand, the relationship between armed groups and "defense" groups "remains fluid," raising challenges to disarmament and reintegration; on the other, Haitian authorities are reportedly considering integrating members of "defense" groups into legitimate forces); UN Secretary-General, *Letter dated 14 July 2026 from the Secretary-General addressed to the President of the Security Council*, UN Doc. S/2026/578, ¶ 9 (Jul. 17, 2026), https://docs.un.org/en/S/2026/578 ("[T]heir

growing role in providing security, exercising social control and generating revenue through extortion, racketeering and protection arrangements blurs the distinction between gangs, vigilante or so-called self-defence groups and local governance structures, contributing to insecurity, impunity and the erosion of public authority."); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 25, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("The proliferation of self-defence groups is worrisome, as they risk turning to criminal activities and being used to further political objectives, perpetuating the historical cycle of gangs. If their activities remain financially rewarding, they will be reluctant to lay down their arms, most of which are illicitly sourced.").

The UN Panel of Experts reported that the Haitian Ministry of Interior has begun registering so-called *Brigadiers de paix* in an effort to formalize "defense" groups' operations. It is unclear how registration will change the current dynamics around "defense" groups. UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 33, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("For the authorities, while formalizing these groups carries risks, leaving them entirely ungoverned carries greater risks. The registration process also aims at building knowledge about their equipment, including firearms, most of which have been obtained illicitly."); *see also* Widlore Mérancourt, *They formed to fight Haiti's gangs. Now they're an obstacle to peace*, Washington Post (Sep. 7, 2026), https://www.washingtonpost.com/world/2026/09/07/they-formed-fight-haitis-gangs-now-theyre-an-obstacle-peace/ (noting that some "defense" group members "wear uniforms, receive funding from the Justice Ministry and enjoy support from the Haitian National Police").

[127] *See* UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 32, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("Interviews with local authorities, residents, Haitian National Police officers and members of these groups themselves suggest that in many areas they are the only protection against gang attacks."); UN Secretary-General, *Letter dated 14 July 2026 from the Secretary-General addressed to the President of the Security Council*, UN Doc. S/2026/578, ¶ 9 (Jul. 17, 2026), https://docs.un.org/en/S/2026/578 ("In several areas, residents reportedly relied on such groups for protection in the absence of a State security presence.").

[128] BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April–June 2026)*, p. 13 (Aug. 25, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Q2%202026%20-%20EN-V3.pdf (reporting 101 people killed between April and June 2026); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (January–April 2026)*, p. 11 (May 8, 2026), https://binuh.unmissions.org/sites/default/files/2026-05/Q1%202026%20-%20ENGLISH.pdf (reporting 81 people killed between January and April 2026); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 74, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("Summary executions of children allegedly associated with gangs have been reported, carried out by security forces and self-defence groups."); *see also* OHCHR, *High Commissioner Türk: We need all eyes on Haiti* (Oct. 2, 2026), https://www.ohchr.org/en/statements-and-speeches/2026/10/high-commissioner-turk-we-need-all-eyes-haiti (reporting 280 people killed or injured between January and October 2026).

[129] UN Secretary-General, *Letter dated 14 July 2026 from the Secretary-General addressed to the President of the Security Council*, UN Doc. S/2026/578, ¶ 9 (Jul. 17, 2026), https://docs.un.org/en/S/2026/578 ("Interviews conducted by United Nations entities documented incidents of so-called "popular justice", including lynchings of individuals suspected of gang affiliation."); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April–June 2026)*, p. 13 (Aug. 25, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Q2%202026%20-%20EN-V3.pdf (42% of victims "were unarmed or were not involved in an act posing an imminent lethal threat to others;" some were "apprehended while committing thefts in abandoned homes or small businesses, before being killed with stones, sticks, or machetes," and bodies were usually burned with gasoline after); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 7 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("defense" groups target individuals suspected of having ties to armed groups, including "women and girls accused of being the intimate partners of gang members," as well as "other people perceived as committing common crimes, such as petty theft").

[130] *See* RNDDH, *Massacres à Kenscoff en juillet et en août 2026 : Le CSPN livre la population haïtienne sans protection ni défense*, ¶ 31 (Sep. 16, 2026), https://web.rnddh.org/wp-content/uploads/2026/09/7-Rap-Situation-DH-Kenscoff-16Sept2026.pdf (noting coordination between police and a "defense" group in Kenscoff); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 108, 112, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (some PNH officers give or sell ammunition to "defense" groups, including from PNH stockpiles); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April–June 2026)*, p. 13 (Aug. 25, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Q2%202026%20-%20EN-V3.pdf (a "defense" group in Mirebalais supported a police operation in the area in April).

[131] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 32, 39, 61, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; UN Secretary-General, *Letter dated 14 July 2026 from the Secretary-General addressed to the President of the Security Council*, UN Doc. S/2026/578, ¶ 9 (Jul. 17, 2026), https://docs.un.org/en/S/2026/578 ("Armed gangs controlling Sarthe and Terre Noire reportedly received support from vigilante or so-called "self-defence" groups."); Jacqueline Charles, *Armed gangs continue attacks on Haitian farmers on third consecutive day*, Miami Herald (Apr. 1, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article315256625.html (the former leader of a "defense" group in the Artibonite Department known as the Coalition des Révolutionnaires pour Sauver l'Artibonite, or the Jean Denis Coalition, "reportedly defected" to the *Gran Grif* armed group; prior to his defection, the "defense" group under his leadership "had been linked to several mass killings, including a massacre in May 2025 that left at least 55 residents dead in the town of Préval"); *see also* Widlore Mérancourt, *They formed to fight Haiti's gangs. Now they're an obstacle to peace*, Washington Post (Sep. 7, 2026), https://www.washingtonpost.com/world/2026/09/07/they-formed-fight-haitis-gangs-now-theyre-an-obstacle-peace/ (detailing the abuses of the Jean Denis Coalition, which one victim claims "have become the gangs themselves").

[132] UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 25, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241.

[133] Edouard Paultre, *How corruption has captured the Haitian state*, American Jewish World Service, https://ajws.org/stories/how-corruption-has-captured-the-haitian-state/ (last visited Oct. 19, 2026); Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ (discussing the "climate of impunity and corruption" fomented by former President Jovenel Moïse, in which "[h]igh-ranking government officials often colluded with armed gangs to suppress political opposition"); *see also* Thomas Lalime, *A Decade Without Elections, Seven Years of Economic Decline*, Le Nouvelliste (Mar. 30, 2026), https://lenouvelliste.com/en/article/265767/a-decade-without-elections-seven-years-of-economic-decline ("Generalized insecurity and the proliferation of armed gangs are merely expressions of this dual [political and economic] crisis."). For a deep exposition of these dynamics, see Jake Johnston, *Aid State: Elite Panic, Disaster Capitalism, and the Battle to Control Haiti* (2024).

[134] The former ULCC head and other experts emphasize that the decree effectively immunizes government actors from accountability for corruption and undermines the capacity of the nascent specialized judicial unit mandated to investigate and prosecute financial crimes. Widlore Mérancourt & Wethzer Piercin, *Why Fils-Aimé Dismissed the Head of Haiti's Anti-Corruption Agency*, AyiboPost (Jul. 5, 2026), https://ayibopost.com/why-fils-aime-dismissed-the-head-of-haitis-anti-corruption-agency/; UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 40, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 (the Panel emphasized that "the adoption of a decree establishing a High Court of Justice with exclusive jurisdiction over senior State officials, which, by creating a complex mechanism, renders prosecution of high State officials virtually impossible" undermines efforts toward sustainable peace, democratic governance, and the fight against impunity"); Rhinews, *Le RNDDH dénonce la mise sous scellés de dossiers de corruption et interpelle le ministre de la Justice…* (May 26, 2026), https://www.rhinews.com/actualites/le-rnddh-denonce-la-mise-sous-scelles-de-dossiers-de-corruption-et-interpelle-le-ministre-de-la-justice/ (in a letter to the Minister of Justice and Public Security, RNDDH expressed its concern about "the sealing of several corruption cases involving former high-ranking state officials," which it says is linked to the High Court of Justice decree and is evidence that "that the administration of justice is totally beyond the control of public authorities, particularly at the level of the prosecutors' offices"); Pierre Espérance, *Haiti's New Courts Could Change Everything — Or Nothing At All*, Just Security (Jul. 23, 2026), https://www.justsecurity.org/148702/haiti-specialized-courts-vetting/ ("The problem is that this [High] court [of Justice] does not currently exist; nor is there a parliament, whose vote is needed to initiate prosecutions. If the decree stands, cases against the country's most powerful officials could be diverted away from the specialized courts and disappear into legal limbo. To show he is serious about fighting corruption and impunity, Prime Minister Alix Didier Fils-Aimé should revoke the decree. As long as it remains in place, the kinds of cases that these new courts are intended to try could remain beyond their reach."); Rosy Auguste Ducéna, *A court built to delay justice*, AJWS, https://ajws.org/stories/a-court-built-to-delay-justice/ (last visited Oct. 19, 2026) ("There was a long line of leaders many Haitians hoped would finally face justice in these new courts: a former president, several former prime ministers, and dozens of former cabinet ministers implicated in the massive PetroCaribe corruption scandal—including some later sanctioned by the United States and Canada for corruption and gang sponsorship. . . . This new decree does not simply delay justice for them—it makes it nearly impossible for them to ever face consequences."); Le Nouvelliste, *Michon in the Corruption Anthill* (Aug. 3, 2026), https://lenouvelliste.com/en/article/270498/michon-in-the-corruption-anthill (then-French Ambassador to Haiti Antoine Michon said the "decree offers near-total impunity—an institutionalization of impunity—for all past, present and future political leaders") (*internal quotations omitted*); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 33 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (the decree establishing the organization and function of the High Court of Justice "drew criticism from civil society and justice actors, who argued that assigning cases against senior officials to the Senate – which currently does not exist – undermines accountability by shielding those officials from prosecution. . . . [and] described the measure as a form of self-amnesty, noting that only Parliament has the constitutional authority to grant amnesty") (*internal quotations omitted*); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 89, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; Edouard Paultre, *How corruption has captured the Haitian state*, American Jewish World Service, https://ajws.org/stories/how-corruption-has-captured-the-haitian-state/ (last visited Oct. 19, 2026); *see also* IJDH, *Human Rights Update – March 2026*, notes 176-177 and associated text (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf; note 24.

[135] Lenz Beth Ferlyn Alparète, *Alix Didier Fils-Aimé réaffirme l'engagement du gouvernement contre la corruption*, Juno7 (Sep. 15, 2026), https://www.juno7.ht/alix-didier-fils-aime-ulcc-lutte-corruption/.

[136] Widlore Mérancourt & Wethzer Piercin, *Why Fils-Aimé Dismissed the Head of Haiti's Anti-Corruption Agency*, AyiboPost (Jul. 5, 2026), https://ayibopost.com/why-fils-aime-dismissed-the-head-of-haitis-anti-corruption-agency/ ("The government has offered no explanation for his dismissal or outlined the broad direction of any anti-corruption strategy. Nor has it provided the Haitian public with documented explanations regarding several major decisions taken in recent months, including the signing of significant government contracts and the purchase of buildings benefiting private-sector actors."); *see also id.* (according to the former ULCC director general, "no working meetings were ever held with the Prime Minister's Office" and "[t]heir interactions . . . were limited to administrative formalities, including requests for authorization to travel abroad;" he said he "sees this as a break from the practices of previous administrations, which regularly met with the agency to discuss its mission, strategic planning, and corruption prevention policies"); Rezo Nòdwes, *Haïti | ULCC : la page Hans Joseph tournée, les dossiers Martelly et Céant rangés au placard ?* (Jul. 18, 2026), https://rezonodwes.com/2026/07/haiti-ulcc-la-page-hans-joseph-tournee-les-dossiers-martelly-et-ceant-ranges-au-placard/; Reynoldson Mompoint, *The dismissal of Jacques Hans Ludwig Joseph: an institutional turning point or the prelude to a political shuffle?*, Haiti Liberté (Jul. 22, 2026), https://canada-haiti.ca/content/dismissal-jacques-hans-ludwig-joseph-institutional-turning-point-or-prelude-political.

[137] *See generally* UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714.

[138] UN, *OHCHR/Türk Haiti* (Oct. 2, 2026), https://media.un.org/unifeed/en/asset/d363/d3638971; UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 35, UN Doc. S/2026/714 (Sep. 8, 2026),

https://docs.un.org/en/S/2026/714 ("The inability to contain gang leaders. . . . can be partly explained by the gangs' integration into criminal networks that span government and economic sectors, thereby constraining police operations and investigations. Despite the gangs' apparent autonomy, ties persist between gangs and State and private actors – particularly ahead of elections, when territorial control and perceptions of stability are critical."); Haiti Libre, *Haïti - FLASH : Une certaine «collusion» entre politiciens et gangs, menace les élections en Haïti* (Sep. 11, 2026), https://www.haitilibre.org/article-48416-haiti-flash-une-certaine-collusion-entre-politiciens-et-gangs-menace-les-elections-en-haiti.html (the Secretary General of the Organization of American States: "There is a certain collusion between the political world and the gangs. I say it clearly because everyone knows it, but nobody talks about it."); Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/; Alterpresse, *Haïti : L'ambassadeur français Antoine Michon alerte sur l'imbrication entre criminalité et sphère politique* (Aug. 3, 2026), https://www.alterpresse.org/Haiti-L-ambassadeur-Antoine-Michon-alerte-sur-l-imbrication-entre-criminalite-et-sphere-politique ("[Then-]French Ambassador [to Haiti] Antoine Michon warned of the intertwining of crime and the political sphere, which he considers a major source of concern for the stability of the country. . . . [He was] referring in particular to the fact that some figures associated with the criminal underworld continue to operate in the political sphere."); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 67, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 (discussing the Panel's investigations into illicit financial flows, including involving the financing of armed group-related activities, "that contribute to the denial of the basic needs of the Haitian people"); *see also* Edouard Paultre, *How corruption has captured the Haitian state*, American Jewish World Service, https://ajws.org/stories/how-corruption-has-captured-the-haitian-state/ (last visited Oct. 19, 2026) ("[C]orruption networks. . . . [h]ave instrumentalized gangs to target popular resistance, elevating gang power.").

[139] *See, e.g.*, Juhakenson Blaise, *OAS urges Haiti to bar candidates tied to criminal groups as filings open*, Haitian Times (Sep. 15, 2026), https://haitiantimes.com/2026/09/15/oas-urges-haiti-bar-candidates-criminal-ties/ ("Among those previously sanctioned by international governments [for financing armed groups, drug trafficking, corruption, or other criminal activity] are former President Michel Joseph Martelly; former Prime Ministers Jean-Henry Céant and Laurent Lamothe; former senators Youri Latortue, Joseph Lambert, Nenel Cassy and Rony Célestin; [and] former ministers Berto Dorcé and Liszt Quitel.").

[140] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 85, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (noting the involvement of Departmental Law Enforcement Unit officers in the Artibonite Department in "the diversion of ammunition from Haitian National Police stockpiles, support for the spoliation of land and collusion with gang members"); Le Nouvelliste, *Un inspecteur de police arrêté pour des liens présumés avec un gang* (Jul. 10, 2026), https://lenouvelliste.com/article/269700/un-inspecteur-de-police-arrete-pour-des-liens-presumes-avec-un-gang (reporting the arrest of a police inspector "for his alleged affiliation with a criminal group"); Dimitry Charles, *Haïti : un inspecteur de police arrêté pour des liens présumés avec un gang spécialisé dans les enlèvements*, Juno7 (Jul. 10, 2026), https://www.juno7.ht/inspecteur-pnh-arrete-liens-presumes-gang/ (the case of the police inspector "revives concerns about possible infiltration or complicity within the institutions responsible for public safety"); *see also* BINUH, *Flash Report - Intensification of Gang Violence in the Plaine du Cul-de-Sac Area and Cité Soleil (March - July 2026)*, pp. 9, 24 (Aug. 6, 2026), https://binuh.unmissions.org/en/document-library/flash-report-intensification-of-gang-violence-in-the-plaine-du-cul-de-sac-1 (noting reports alleging that PNH officers "acted as escorts for gang members or supplied them with weapons and ammunition;" residents in the Plaine du Cul-de-Sac say that security forces "targeted only certain gangs operating in the [area];" the residents say they "observed police officers instructing members of certain gangs controlling Cité Soleil . . . to stay out of the clashes," and that certain armed groups "reportedly sought to encourage the continued presence of the police in Cité Soleil in order to prevent further attacks by their rivals").

[141] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 37, 39, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 19, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241.

[142] UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 46, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("[A]ll gangs have some components of Haitian National Police ammunition in their stockpiles. . . . [D]iversions from the Haitian National Police have historically constituted a real concern. . . . Although the Haitian National Police has made arrests of several corrupt officers within its ranks . . ., diversions continue, including by officers collecting unused ammunition and reselling it illicitly to self-defence groups, gangs, private security companies or individuals looking to protect themselves."); *id.* at ¶ 47 (the Panel found that ammunition being used by armed groups in Bel-Air and Kenscoff "was consistent with those produced by [Brazilian company] CBC and that the Haitian Armed Forces had signed a contract with the company in July 2023 to import 1.5 million rounds of this type of ammunition"); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 37, 109-115, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (noting diversions of PNH weapons and concerns about "a small sample of Kenyan-manufactured ammunition retrieved from gangs"); *see also* Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, Council on Foreign Relations (**CFR**) (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees (over the 2025-2026 winter, "Haitian security forces dismantled a criminal network that included five of their own—national police officers who had been supplying a gang with escorts, weapons, and ammunition as it ran kidnappings").

[143] *See* UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 48-59, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (discussing the arrests and releases of former Parliament member Alfrédo Junior Antoine and former senator Nenel Cassy for their well-documented use of armed groups as tools of political violence); BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, pp. 21-22 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting the lack of progress "in the proceedings against former deputy Prophane Victor , as well as against a former director of the Economic and Social Assistance Fund (FAES), a former director of the National Solid Waste Management Service (SNGRS), and ten other individuals arrested in early 2025 by the DCPJ for their alleged financial and material support to armed gangs;" the case against "former parliamentarian Nenel Cassy, who was being prosecuted for the alleged financing of criminal organizations,

. . . [was] closed without further action on 19 August 2025," and Cassy was released); Le Nouvelliste, *La Cour d'appel renvoie Magalie Habitant, Profane Victor et Elionor Devallon au tribunal criminal* (Jul. 21, 2026), https://lenouvelliste.com/article/270156/la-cour-dappel-renvoie-magalie-habitant-profane-victor-et-elionor-devallon-au-tribunal-criminel.

[144] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 39, 47, 92, 144-150, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; Fenel Pélissier, *Des bandits armés « volent des terrains » à Jérémie*, AyiboPost (Jul. 10, 2026), https://ayibopost.com/des-bandits-armes-volent-des-terrains-a-jeremie/ (armed individuals in the Grand'Anse Department who are "accused of illegal occupation of land and intimidation" allegedly operate in collusion with the Directorate General of Taxes and "have their own notary to prepare the files, their own lawyer to plead, their own judge to make the decision and their own government commissioner to issue the conclusions") (*internal quotations omitted*); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, p. 19 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 ("In February [2026], the Central Directorate of the Judicial Police . . . issued arrest warrants against several former public officials, including a former mayor of Port-au-Prince, a former member of parliament, a former Director General of Customs, and a former Minister of Economy and Finance, for serious offences, including money laundering, financing of terrorism, and illicit trafficking of firearms and ammunition, in connection with alleged support to armed gangs."); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 68-69, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 (investigation reports, including by Haiti's main anti-corruption agency, concerning the former mayor of l'Aracahaie reveal "how close the suspect is to gang leaders, and the logistical support that she has been providing to gangs"); *id.* at ¶ 26 (local armed groups in the North Department specializing in land spoliation are reportedly working with BSAP agents; "[l]and spoliation schemes have also been put in place by former politicians in Kenscoff"); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 31 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (noting a Central Directorate of the Judicial Police (**DCPJ**) report "linking a former State official to individuals providing support to gangs in the Port-au-Prince metropolitan area," as well as interrogations of "senior State officials, former officials, and an individual listed under the United Nations Security Council sanctions . . . by investigating judges in connection with allegations of corruption and gang financing"); *see also* UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 31, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (noting "the involvement of former and current senior government officials and officers of the Haitian National Police" in private security companies, amny of which "procure arms and ammunition illicitly, including of calibres in excess of domestic limits"). According to information shared by Origène Louis, the National Director and Head Coordinator of the Small Haitian Peasants' Front, these thefts are carried out by an association of wrongdoers that includes land thieves, corrupt judges, the police, and the armed groups. These armed groups who are stealing land are the same ones who supplied the armed groups in many parts of the country. They are used as tools by political and economic elites, by judges and police to push people off of their land. The impact on small farmers is huge: it leaves them with nothing, with no place to work to grow food or tend their animals. They can no longer provide for their families, their children can't go to school, and when they are sick, they can't go to the hospital. This causes many farmers to die prematurely. This land theft also causes a lot of rural exodus; many farmers leave the provinces to go down to the city to do odd jobs to make a living. (Notes on file with authors). *See also* notes 279-280.

[145] *See* Section I; *see also* Edouard Paultre, *How corruption has captured the Haitian state*, American Jewish World Service, https://ajws.org/stories/how-corruption-has-captured-the-haitian-state/ (last visited Oct. 19, 2026) ("Gang leaders remain at large, controlling vast territories of the capital and country, which will compromise voting—and they are also likely to channel the funds they have gained through illicit means into the campaigns of candidates who collaborate with them, risking the emergence of gangs as a major political force. Without safeguards, we could see gang-beholden candidates win the presidency, as well as a majority of seats in parliament, and the mayoralties of the country's largest cities."); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 62-63, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (noting the importance of the Artibonite Department as the country's second-largest electoral district, and warning that certain political actors "may exploit ties to gangs to mobilize support, intimidate rivals and undermine stability," while "self-defence groups linked to local political dynamics could be used as tools of intimidation, underscoring the need for mechanisms to prevent further destabilization"); *id.* at ¶ 43 ("The Panel is concerned about collusion between some members of local authorities and gangs within public institutions. These ties aim at consolidating territorial control and influencing upcoming elections, also building on [armed group leader] Ti Gabriel's long-standing political connections with a former member of parliament for Cité Soleil.").

[146] *See* note 152.

[147] For an overview, see IJDH, *Human Rights Update – December 2021*, p. 1 (Dec. 2021), https://www.ijdh.org/wp-content/uploads/2021/12/IJDH-Human-Rights-Update-November-2021.pdf; Brian Concannon, *Biden must stop propping up the old guard in Haiti*, Responsible Statecraft (Nov. 12, 2021), https://responsiblestatecraft.org/2021/11/12/how-biden-can-support-democracy-in-haiti/.

[148] CEP, *Statistiques d'enregistrement des candidats*, https://cephaiti.ht/statistiques-enregistrement-des-candidats/ (last visited Oct. 19, 2026).

[149] Lenz Beth Ferlyn Alparète, *Alix Didier Fils-Aimé réaffirme l'engagement du gouvernement contre la corruption*, Juno7 (Sep. 15, 2026), https://www.juno7.ht/alix-didier-fils-aime-ulcc-lutte-corruption/ ("Prime Minister [Fils-Aimé] stated that the fight against corruption is a central issue for justice, governance and the functioning of the State. He also described corruption as a serious threat to the national interest and popular sovereignty."); Alterpresse, *Haïti : L'ambassadeur français Antoine Michon alerte sur l'imbrication entre criminalité et sphère politique* (Aug. 3, 2026), https://www.alterpresse.org/Haiti-L-ambassadeur-Antoine-Michon-alerte-sur-l-imbrication-entre-criminalite-et-sphere-politique (then-French Ambassador to Haiti Antoine Michon "denounced the lack of transparency in the management of public funds, lamenting that they are frequently misappropriated or used inefficiently," with corruption being "a major obstacle to the country's recovery"); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 17 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("Corruption, impunity and poor

governance continue to cripple Haitians' institutions, erode the rule of law and remain a barrier to people's enjoyment of their human rights."); Edouard Paultre, *How corruption has captured the Haitian state*, American Jewish World Service, https://ajws.org/stories/how-corruption-has-captured-the-haitian-state/ (last visited Oct. 19, 2026) (corruption "fuels government policies, hobbles the state's functioning, and paralyzes the country").

[150] Transparency International, *Corruption Perceptions Index 2025* (Feb. 10, 2026), https://www.transparency.org/en/cpi/2025.

[151] One is a US$6 billion contract with a company called Metric Correctional Facility S.A. for the rental of three prisons to be built in Haiti (the Haitian government will bear the cost of construction for the prisons); another is a border and maritime security contract worth over US$13 million with a company called Evergreen Trading System Limited; a third is the $52 million contract with Erik Prince's security firm (*see* notes 120-125); and the fourth is a $780,000 per year contract signed with a U.S. lobbyist. FJKL, *Liquidation de la souveraineté nationale via des contrats léonins : La Fondasyon Je Klere (FJKL) crie au scandale*, ¶¶ 56-59 (Mar. 2026), https://docs.google.com/document/d/1fyau3xLmrs-xd6QpCX3Lpr3IN6FYmgJLFTGKy0KLrKE/edit?tab=t.0 (likening the contracts to "the 'double debt' contracts that hindered Haiti's development or the contracts during the period of the U.S. occupation in 1915, when Haiti lost its national sovereignty," and emphasizing that they "were not negotiated with the State's interests in mind" and "must be investigated by anti-corruption agencies"); Harvard Law School International Human Rights Clinic, *The New Humanitarian Actors: Politicization, Corporization, & Militarization in the Aid Sector*, p. 11 (Jun. 2026), https://humanrightsclinic.law.harvard.edu/wp-content/uploads/2026/06/New-Humanitarian-Actors-Politicization-Corporatization-Militarization-in-the-Aid-Sector-060326.2.pdf ("While private financial firms and consultancies have long assisted developing states with customs reform, inspection systems, and revenue administration, the delegation of both border enforcement and revenue collection to a single security contractor effectively contracts out core elements of the state, undermining sovereignty and reinforcing capture issues. It also raises concerns about avenues for accountability and procedural justice in a role rife with opportunities for corruption and coercion."); Jacqueline Charles & Shirsho Dasgupta, *Amid looming election questions, silence on TPS, Haiti hires Trump operative to lobby*, Miami Herald (Sep. 22, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317336729.html ("André Michel, a lawyer and political leader who belongs to a newly formed coalition of Haitian political parties and organizations, called the agreement [with the U.S. lobbyist] 'an absolute scandal,' saying it is 'an exorbitant amount for a country like Haiti' and 'a waste of public funds.' Michel linked the lobbying contract and its timing to broader concerns about the government, including its refusal to rescind a controversial decree protecting senior government officials from prosecution in regular courts."); *see also* Widlore Mérancourt & Wethzer Piercin, *Why Fils-Aimé Dismissed the Head of Haiti's Anti-Corruption Agency*, AyiboPost (Jul. 5, 2026), https://ayibopost.com/why-fils-aime-dismissed-the-head-of-haitis-anti-corruption-agency/ (noting the government's failure to provide "the Haitian public with documented explanations regarding several major decisions taken in recent months, including the signing of significant government contracts and the purchase of buildings benefiting private-sector actors"); Jude Pierre Louis, *'We cannot take it anymore': Haiti's informal vendors protest over gang warfare*, Global Voices (Sep. 27, 2026), https://globalvoices.org/2026/09/27/we-cannot-take-it-anymore-haitis-informal-vendors-protest-over-gang-warfare/ (the General Coordinator of the Informal Vendors Collective questions where the 21 billion gourdes that the government spent to restart the economy through a post-COVID recovery program has gone, and asks the ULCC to demand answers); X, Jake Johnston, @JakobJohnston (Sep. 15, 2026), https://x.com/JakobJohnston/status/2099850641212383316 (reporting that Enrique Segura, the father of U.S. Assistant Secretary of State for Western Hemisphere Affairs Juan Pablo Segura, is a reported business partner of Blackwater founder Erik Prince, who is tied to at least two of the private security companies that the Haitian government has reportedly contracted with).

[152] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 14, 152-159, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (reporting "persistent fraud in the issuance of Haitian passports in the country. . . . enabling the embezzlement of fees and bribery from applicants seeking genuine documents for illicit purposes," and fraud by high-level officials involved in the elvers (baby eel) trade); BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 22 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026; Widlore Mérancourt & Wethzer Piercin, *Why Fils-Aimé Dismissed the Head of Haiti's Anti-Corruption Agency*, AyiboPost (Jul. 5, 2026), https://ayibopost.com/why-fils-aime-dismissed-the-head-of-haitis-anti-corruption-agency/ (the ULCC referred several investigative reports to the courts in 2024 and 2025, including involving the Minister of Youth and Sports, the former National Television of Haiti director, former President Michel Martelly, members of the TPC, former lawmakers, and former cabinet ministers); Michelson Césaire, *Appeal Court Sends Edwine Tonton and Several Accused to Criminal Trial*, Le Nouvelliste (Apr. 10, 2026) https://lenouvelliste.com/en/article/266166/appeal-court-sends-edwine-tonton-and-several-accused-to-criminal-trial (the former director of the Social Assistance Fund and several co-defendants are being prosecuted for "acts of illegal conflict of interest and illicit enrichment. . . . abuse of office, breach of trust, forgery and use of forged documents, as well as criminal association" based on a 2023 ULCC investigation); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 58-66, 68, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 (reporting that political actors are implicated in bribery and other corruption schemes in the context of the lucrative elvers sector, which the report likens to a "criminal network," and noting that as of drafting, the ULCC "had submitted at least 63 investigation reports to the judiciary. . . . relate[d] to embezzlement, mismanagement and corruption in various public sectors that are critical to the livelihoods of Haitians"); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶¶ 30, 32 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("[The ULCC] advanced several major investigations into corruption and gang financing. It submitted seven reports to the judicial authorities alleging corruption by former senior officials and their relatives, which resulted in three arrests. The ULCC also issued recommendations for further investigation of a former highest-level official for an alleged false declaration of assets. In addition, the Unit pursued at least five other investigations involving high-ranking officials."); Juhakenson Blaise, *Ten Haitian officials, including a director general, detained in passport fraud case*, Haitian Times (Mar. 25, 2026), https://haitiantimes.com/2026/03/25/haiti-immigration-director-arrested-passport-scandal/ (the director general of the Directorate of Immigration and Emigration and nine employees were arrested for their alleged involvement in a passport fraud scheme; the arrests add "to a pattern of recurring corruption allegations within Haiti's passport system" exposed by the ULCC).

[153] BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 22 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (for example, "the Port-au-Prince Court of Appeal overturned the investigating judge's order to send former senator Youri Latortue to trial for embezzlement of public funds and unlawful conflict of interest, as well as former Senate President Joseph Lambert for obstruction of justice" despite significant evidence against them); Alterpresse, *Haïti : L'ambassadeur français Antoine Michon alerte sur l'imbrication entre criminalité et sphère politique* (Aug. 3, 2026), https://www.alterpresse.org/Haiti-L-ambassadeur-Antoine-Michon-alerte-sur-l-imbrication-entre-criminalite-et-sphere-politique ("There have only been two convictions for corruption in twenty years. The reports produced by the Anti-Corruption Unit have gone unheeded."); Widlore Mérancourt & Wethzer Piercin, *Why Fils-Aimé Dismissed the Head of Haiti's Anti-Corruption Agency*, AyiboPost (Jul. 5, 2026), https://ayibopost.com/why-fils-aime-dismissed-the-head-of-haitis-anti-corruption-agency/ ("[T]he ULCC's broader record since its creation: a large number of investigations, but very few cases resulting in convictions. Out of more than one hundred investigative reports produced over the years, only two have led to convictions."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶¶ 30, 32 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("[J]udicial progress in cases involving corruption and gang financing remains limited."); Edouard Paultre, *How corruption has captured the Haitian state*, American Jewish World Service, https://ajws.org/stories/how-corruption-has-captured-the-haitian-state/ (last visited Oct. 19, 2026) ("Seeking to fend off investigations and prosecutions, corruption networks have eaten away at the efficacy of the justice system to the point where it is essentially impotent to prosecute them. . . . Some 97 percent of [corruption] cases went nowhere in the justice system."); *see also, e.g.*, Juhakenson Blaise, *Haitian court questions former President Martelly in Moïse assassination investigation*, Haitian Times (Jul. 21, 2026), https://haitiantimes.com/2026/07/21/martelly-questioned-in-jovenel-moise-assassination-case/ (noting that former President Michel Martelly has not been convicted in any court despite facing international sanctions; a 2024 ULCC report that "alleged omissions, inconsistencies and suspected false statements in his asset declarations;" and a 2024 arrest warrant in connection with a corruption scandal in Haiti's National Center of Equipment); Juhakenson Blaise, *Former President Martelly returns to Haiti after judicial summons in Moïse assassination case*, Haitian Times (Jul. 16, 2026), https://haitiantimes.com/2026/07/16/michel-martelly-returns-haiti-jovenel-moise-investigation/ (reporting that "[i]t remains unclear whether Haitian prosecutors intend to pursue the [ULCC] recommendations [to initiate criminal proceedings against Martelly]" after he returned to Haiti in July 2026); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, p. 20 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026; Michelson Césaire, *Appeal Court Exonerates Former Senators Latortue and Lambert in Corruption Case*, Le Nouvelliste (Mar. 30, 2026), https://lenouvelliste.com/en/article/265787/appeal-court-exonerates-former-senators-latortue-and-lambert-in-corruption-case; *cf.* Jacqueline Charles & Gérard Maxineau, *U.S. sends another deportation flight to Haiti. A former Haitian official is aboard*, Miami Herald (Sep. 4, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317112606.html (the former head of Haiti's human rights ombudsman, Renan Hédouville – who had been the subject of a ULCC investigation that "accused him of obstruction of justice, unlawful contracting and, among other things, claiming $127,630 in expenses linked to fictitious missions and plane tickets for nearly a dozen trips" while he was head of the Office of Citizen Protection – acknowledged receiving special treatment after self-deporting to Haiti from the United States; "[i]t remains unclear whether Hédouville will face prosecution now that he's back in Haiti"); notes 415-420 and associated text.

[154] *See* note 194.

[155] BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, pp. 13-14 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting at least 584 people killed during security forces' operations against armed groups between April and June 2026); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, pp. 12-13 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (reporting at least 1,149 people killed during security forces' operations against armed groups between January and March 2026); *see also* UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 21 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (reporting at least 3,301 people killed during security forces' operations between March 2025 and January 2026).

[156] BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 14 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (12% between April and June 2026); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, p. 12 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (24% between January and March 2026, most of whom "were struck by stray bullets or by drone explosions while they were in their homes or in the streets"); *see also* UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 11, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("Police operations, including strikes, have caused a significant number of casualties, including among non-gang members."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 21 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (22% of the 3,301 people killed during security forces' operations between March 2025 and January 2026 "were members of the population with no affiliation to gangs struck by stray bullets while inside their residences or in the streets").

[157] OHCHR, *High Commissioner Türk: We need all eyes on Haiti* (Oct. 2, 2026), https://www.ohchr.org/en/statements-and-speeches/2026/10/high-commissioner-turk-we-need-all-eyes-haiti ("Law-enforcement operations continue to raise serious concerns about the unnecessary and disproportionate use of force."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶¶ 21, 27 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("The number of casualties indicates a lack of an imminent threat to life or serious injury and, therefore, unnecessary or disproportionate use of force."); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 40, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("[T]he conduct of security operations involving the use of lethal force . . . raises concerns regarding compliance with international human rights standards."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶¶ 26, 28 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("Some, or even most, of these drone strikes and helicopter operations could be described as targeted killings, given the apparent predetermined, intentional, and deliberate use of lethal force against individuals specifically identified in advance, whereas the sole objective of targeted law enforcement operations

against individuals should be their arrest and detention."); *see also* BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, pp. 13-14 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (emphasizing "that any use of lethal force by law enforcement officials, or by any other actor acting on behalf or in support of the State, must always comply with international human rights law and respect the principles of legality, necessity, proportionality, non-discrimination, precaution, and accountability"); BINUH, *Flash Report - Intensification of Gang Violence in the Plaine du Cul-de-Sac Area and Cité Soleil (March - July 2026)*, pp. 23-24 (Aug. 6, 2026), https://binuh.unmissions.org/en/document-library/flash-report-intensification-of-gang-violence-in-the-plaine-du-cul-de-sac-1 (stressing state responsibility with respect to the use of potentially lethal force, in the context of civilian casualties during security forces' operations against armed groups).

[158] BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 3 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting at least 9 people, including 6 children, killed by explosive drones between April and June 2026); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, p. 13 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (reporting at least 41 people, including 3 children, killed by explosive drones between January and March 2026); IJDH, *Human Rights Update – March 2026*, note 138 (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf; *see also* Jacqueline Charles, *U.N. adds three more Haitian gangs to child violations list as violence surges*, Miami Herald (Jul. 13, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316490122.html ("The [UN] secretary-general also expressed alarm over the use of drones, citing the growing number of child victims.").

[159] UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 39, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("[N]on-governmental organizations and humanitarian personnel were, on several occasions, caught in security forces operations against gangs. Despite attempts by humanitarian organizations to alert the Haitian National Police of the humanitarians' presence, the lack of coordination among the various security forces involved in such operations resulted in explosive drones strikes near humanitarian personnel, exposing them to grave risk.").

[160] Sophie Rutenbar, *Another gang suppression force may win battles, yet lose Haiti's deeper war*, Miami Herald (Apr. 6, 2026), https://www.miamiherald.com/opinion/op-ed/article315290165.html ("[S]ince March 2025, the Haitian National Police has been using increasingly heavy-handed tactics, including indiscriminate attacks by explosive-laden drones."); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 83, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; ICRC, *Haiti: Everything must be done to protect the population from escalating gang violence* (Aug. 19, 2026), https://www.icrc.org/en/article/haiti-do-everything-possible-protect-population-effects-escalating-armed-violence ("'Any scale-up of operations in such densely populated areas must be accompanied by all necessary precautions to spare the civilian population and to prevent a surge in humanitarian needs. Protecting local communities must remain the top priority,' said [ICRC Head of Delegation in Haiti] Silva Chau."); Junior Legrand, *Une quinzaine de camps de déplacés dans des zones contrôlées par les gangs*, AyiboPost (Jun. 23, 2026), https://backoffice.ayibopost.com/une-quinzaine-de-camps-de-deplaces-dans-des-zones-controlees-par-les-gangs/ (describing several incidents of drones hitting areas around disaplacement sites in La Saline and Martissant, destroying shelters and causing injuries to IDPs); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, p. 13 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (describing an incident in which "two girls aged seven and nine were seriously injured when a drone fell into the yard of their home in Martissant," resulting in one of the girls' feet requiring amputation); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶¶ 24, 26 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("During the reporting period, no investigation appears to have been opened by the judicial authorities to establish the legality of these operations and the circumstances in which the killings and injuries occurred. In addition, no accountability mechanism appears to have been put in place to enable victims and members of the population to access effective remedies and justice."); *see also* Rhinews, *Haïti : Washington envisage un renforcement de la coordination avec la société de sécurité privée d'Erik Prince…* (Jul. 23, 2026), https://www.rhinews.com/actualites/haiti-washington-envisage-un-renforcement-de-la-coordination-avec-la-societe-de-securite-privee-derik-prince/ ("According to a State Department official quoted on condition of anonymity, American citizens working for Vectus Global in Haiti are not required to report their activities to U.S. authorities as long as they are acting as contractors for a foreign government, adding that Washington does not exercise any direct oversight over the operations of this private company."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 28 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("According to the United Nations Working Group on the Use of Mercenaries, States are responsible for the conduct of private and military security companies that they empower to exercise governmental authority, such as the use of force or detention, or that act under their instruction, direction, or control. Companies performing these functions are bound by the same international human rights obligations as national police or other state security forces. States therefore have a duty to prevent, investigate, punish and remedy summary executions and other serious violations committed by companies operating under their jurisdiction.").

[161] BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 15 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 ("Some of these victims were apprehended during patrols or at police checkpoints and then executed on the spot. Generally, they were either accused of belonging to or supporting gangs, or of committing theft."); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 74, 82, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; *see also* OHCHR, *High Commissioner Türk: We need all eyes on Haiti* (Oct. 2, 2026), https://www.ohchr.org/en/statements-and-speeches/2026/10/high-commissioner-turk-we-need-all-eyes-haiti ("The number of summary executions carried out by specialized police units has fallen significantly – by almost half compared with 2025. However, people allegedly associated with gangs continue to be summarily executed."); RNDDH, *Situation préoccupante sur l'île de La Gonâve : Le RNDDH presse le CSPN et le CSPJ d'intervenir*, ¶¶ 15-55, 57 (Aug. 17, 2026), https://web.rnddh.org/situation-preoccupante-sur-lile-de-la-gonave-le-rnddh-presse-le-cspn-et-le-cspj-dintervenir/?lang=en (discussing incidents of extrajudicial executions and other violence by police officers); Daniel Dickinson, *Haiti: Signs of hope despite gang violence and political uncertainty*, UN News (Jul. 19, 2026), https://news.un.org/en/story/2026/07/1167963 (noting

"40 cases involving summary executions by police officers"); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, pp. 3, 13-14 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026; UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 22 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (most extrajudicial executions carried out by members of specialized police units). According to information shared by Michelle Karshan, Executive Director of Alternative Chance/*Chans Altenativ*, armed group members have been found "cuffed and shot and killed" in police stations. (Notes on file with authors).

[162] Dánica Coto & Evens Sanon, *Haiti struggles with rise in kidnappings as general election looms*, Washington Post (Oct. 1, 2026), https://www.washingtonpost.com/world/2026/10/01/haiti-kidnappings-gangs-force/20054300-bdb4-11f1-81fc-9b76f8343b6c_story.html ("Le Cour. . . . said criminal groups are using official or cloned police uniforms, vehicles and license plates to carry out kidnappings, and he noted allegations that some law enforcement agents are involved. 'It takes intelligence to kidnap high-level targets, and that intelligence usually comes from collusion,' he said."); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 136, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 16 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (describing incidents in which "kidnappings documented in the capital were . . . perpetrated or facilitated by individuals wearing uniforms similar to those of law enforcement," prompting investigations by the DCPJ and the General Inspectorate of the PNH "into the alleged involvement of police officers and administrative personnel in these criminal acts"); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, p. 14 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (local sources report that some kidnappings are "allegedly committed or facilitated by police officers"); RNDDH, *Situation préoccupante sur l'île de La Gonâve : Le RNDDH presse le CSPN et le CSPJ d'intervenir*, ¶¶ 13, 57, 59 (Aug. 17, 2026), https://web.rnddh.org/situation-preoccupante-sur-lile-de-la-gonave-le-rnddh-presse-le-cspn-et-le-cspj-dintervenir/?lang=en (reporting that police at the Anse-à-Galets police station extort motorcycle drivers and "force citizens— after severely beating them—to sign, in exchange for their release, police reports in which they must admit to having been arrested for rebellion").

[163] Vant Bèf Info, *Delmas : la police disperse une deuxième manifestation favorable à la Cour de cassation* (Sep. 5, 2026), https://vantbefinfo.com/delmas-la-police-disperse-une-deuxieme-manifestation-favorable-a-la-cour-de-cassation/; Juhakenson Blaise, *Tear-gassed students in Haiti plan new march to get hospital moved from gang territory*, Haitian Times (Jun. 30, 2026), https://haitiantimes.com/2026/06/30/medical-students-tear-gassed-protest-haiti-hospital-relocation/.

[164] AlterPresse, *Haïti-Hueh : La Pnh ouvre une enquête après des tirs ayant blessé un étudiant lors d'une marche* (Jul. 2, 2026), https://www.alterpresse.org/Haiti-Hueh-La-Pnh-ouvre-une-enquete-apres-des-tirs-ayant-blesse-un-etudiant-lors-d-une-manifestation (someone driving through the crowd of protesters fired shots into the air, shooting a student in the arm; according to the protesters, the attacker was a PNH officer); Juhakenson Blaise, *Student shot during second protest for the relocation of Haiti's largest hospital*, Haitian Times (Jul. 2, 2026), https://haitiantimes.com/2026/07/02/medical-student-shot-protest-general-hospital-relocation/.

[165] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 84, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("In 2025, 125 cases of actual or attempted cases of extrajudicial executions were transmitted by the Human Rights Section of BINUH to the Inspectorate General of the Haitian National Police, 17 of which have been completed and the rest remaining under investigation."); BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 16 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 ("Limited progress was recorded, compared with the previous quarter, in the handling of the 248 cases (264 victims) of extrajudicial executions and attempted extrajudicial executions transmitted by the [BINUH Human Rights Service] HRS to the [Inspector General of the PNH] IGPNH in 2025 and 2026. Of the 248 cases, 226 are still under investigation, while 22 have been finalized and remain pending closure reports. . . . No judicial proceedings have been initiated against the Public Prosecutor of Miragoâne (Nippes department), Jean Ernest Muscadin, for his possible involvement in at least 76 summary executions documented between 2022 and 2025."); BINUH, *Flash Report - Intensification of Gang Violence in the Plaine du Cul-de-Sac Area and Cité Soleil (March - July 2026)*, pp. 23-24 (Aug. 6, 2026), https://binuh.unmissions.org/en/document-library/flash-report-intensification-of-gang-violence-in-the-plaine-du-cul-de-sac-1 ("To date, the HRS has received no information indicating that the authorities have opened investigations to establish the circumstances and responsibilities relating to deaths and injuries caused during security force operations, including in cases where children were affected."); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, pp. 13, 21 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (noting the lack of "information indicating that the authorities have opened investigations to establish the circumstances and responsibilities relating to deaths and injuries caused during operations by the security forces and the private military company, including where children were affected," and the limited progress in investigations into extrajudicial executions); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 23 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("Since the vetting process of the Haitian National Police began in June 2023, the General Inspectorate of the Haitian National Police has opened investigations into 334 police officers; however, none of these cases has been finalized. Between 1 March 2025 and 8 January 2026, the General Inspectorate opened investigations into 222 incidents involving the possible unlawful use of force by the police. . . . As of January 2026, investigations had been opened into 174 cases, none of which had been finalized, while the remaining cases were still awaiting the opening of investigations. Police authorities continued to cite resource constraints and logistical challenges linked to gang-related insecurity as the main reasons for delays in investigations and accountability measures for alleged human rights violations committed by police forces."); *see also* Junior Legrand, *Le commissaire de Pétion-Ville traîné en justice après la mort de Nestor*, AyiboPost (Aug. 5, 2026), https://ayibopost.com/le-commissaire-de-petion-ville-traine-en-justice-dans-laffaire-nestor/ (describing the lack of progress in legal proceedings against police officers accused of killing a civilian in June 2026).

[166] *See generally* Coalition of Haitian and Solidarity Human Rights Organizations, *Submission to the United Nations Human Rights Council Universal Periodic Review Re Haiti Justice Sector* (Jul. 17, 2026), https://www.ijdh.org/wp-

content/uploads/2026.07.17-UPR-Submission-re-Justice-Sector-by-HaitiHumanRightsCoalition-EN.pdf (providing a historic and contemporary overview of related issues, as submitted to Haiti's ongoing Universal Periodic Review).

[167] For example, the Truth, Justice, and Reparations Commission established by the transitional government in 2024 to investigate grave abuses remains non-operational. The two decrees adopted by the transitional government in December 2025 regulating the exercise of freedom of expression and establishing the procedures of the High Court of Justice likewise reflect the government's disinterest in ensuring transparency and accountability. *See* notes 24, 134.

[168] Pierre Espérance, *Haiti's New Courts Could Change Everything — Or Nothing At All*, Just Security (Jul. 23, 2026), https://www.justsecurity.org/148702/haiti-specialized-courts-vetting/; Haiti Protection Cluster, *Haiti: Protection Analysis Update*, p. 5 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update; UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 17 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74.

[169] *See, e.g.*, OCNH, *Situation de la justice et de l'état civil dans la Grand'Anse et les Nippes : l'OCNH alerte sur le dysfonctionnement structurel de la chaîne pénale et dénonce des irrégularités procedurals graves*, pp. 1-2 (Aug. 17, 2026), https://www.ocnh.org/rapports/situation-de-la-justice-et-de-letat-civil-dans-la-grandanse-et-les-nippes (resulting abuses include violations of fair and speedy trial guarantees, usurpation of judicial functions, and procedural irregularities).

[170] Haiti Protection Cluster, *Haiti Protection Analysis Update*, pp. 4-5 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (describing justice institutions as severely constrained by limited resources and the deterioration of state authority, with courts operating at limited capacity and judicial personnel facing security constraints); OHCHR, *Specialised judicial units in Haiti* (Jun. 2, 2026), https://www.ohchr.org/en/press-briefing-notes/2026/06/specialised-judicial-units-haiti; *see also, e.g.*, Michelson Césaire, *Justice in Lost Territory: Several Peace Courts at a Standstill*, Le Nouvelliste (Sep. 17, 2026), https://lenouvelliste.com/en/article/272016/justice-in-lost-territory-several-peace-courts-at-a-standstill; Alterpresse, *Haïti : L'Ocnh dénonce les défaillances de la justice et de l'état civil dans la Grande Anse et les Nippes* (Aug. 19, 2026), https://www.alterpresse.org/Haiti-L-Ocnh-denonce-les-defaillances-de-la-justice-et-de-l-etat-civil-dans-la-Grand-Anse-et-les-Nippes; RNDDH, *Situation préoccupante sur l'île de La Gonâve : Le RNDDH presse le CSPN et le CSPJ d'intervenir*, ¶¶ 3-4 (Aug. 17, 2026), https://web.rnddh.org/situation-preoccupante-sur-lile-de-la-gonave-le-rnddh-presse-le-cspn-et-le-cspj-dintervenir/?lang=en.

[171] Peace Courts – the lowest level of the Haitian justice system – are nonfunctional in the municipalities of Carrefour, Croix-des-Bouquets, Croix-des-Missions, Mirebalais, Gressier, Cité Soleil, Liancourt, Arcahaie, and North, South, and East sections of Port-au-Prince. Michelson Césaire, *Justice in Lost Territory: Several Peace Courts at a Standstill*, Le Nouvelliste (Sep. 17, 2026), https://lenouvelliste.com/en/article/272016/justice-in-lost-territory-several-peace-courts-at-a-standstill.

[172] Michelson Césaire, *Justice in Lost Territory: Several Peace Courts at a Standstill*, Le Nouvelliste (Sep. 17, 2026), https://lenouvelliste.com/en/article/272016/justice-in-lost-territory-several-peace-courts-at-a-standstill (insecurity has forced the relocation of the Croix-des-Missions Court of First Instance, the Port-au-Prince Court of First Instance and Court of Appeal, and the *Cour de Cassation*). According to information shared by the BAI's Dieunel Fleury Jean, services at relocated courthouses "continue, though at a slowed pace." (Notes on file with authors).

[173] The Court was initially moved to the former labor court building, then to an expensive and cramped building in Lalue, and most recently to a new building in Delmas, where it still lacks sufficient space, officers, and courtrooms. Michelson Césaire, *Justice in Lost Territory: Several Peace Courts at a Standstill*, Le Nouvelliste (Sep. 17, 2026), https://lenouvelliste.com/en/article/272016/justice-in-lost-territory-several-peace-courts-at-a-standstill. According to information shared by the BAI's Dieunel Fleury Jean, "the court continues to operate at a reduced pace, because the space in which it is housed is not suited to its mission." (Notes on file with authors).

[174] Michelson Césaire, *Reprise des assises criminelles à Port-au-Prince : sept procès au programme après hui tans s'interruption*, Le Nouvelliste (Jul. 27, 2026), https://lenouvelliste.com/article/270334/reprise-des-assises-criminelles-a-port-au-prince-sept-proces-au-programme-apres-huit-ans-dinterruption.

[175] Coalition of Haitian and Solidarity Human Rights Organizations, *Submission to the United Nations Human Rights Council Universal Periodic Review Re Haiti Justice Sector*, note 139 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Justice-Sector-by-HaitiHumanRightsCoalition-EN.pdf (citing inputs from knowledgeable local organizations).

[176] *Compare* Le Moniteur, *Décret établissant le budget rectificatif de la République d'Haïti, exercise fiscal 2025-2026*, p. 11 (Jun. 5, 2026), https://budget.gouv.ht/storage/app/uploads/public/6a3/07c/39c/6a307c39c95b6633540908.pdf *with* Ministère de l'Economie et des Finances, *Budget de la République, Decree establishing the Rectifying Budget of the Republic of Haiti. - Fiscal year 2024-2025*, p. 11 (Apr. 24, 2025) https://www.mef.gouv.ht/budgets/lois (1.9% in the previous fiscal year). According to information shared by the BAI's Dieunel Fleury Jean, the government continually fails to allocate sufficient resources to the justice sector. (Notes on file with authors).

[177] BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 20 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 ("[P]ersistent difficulties, notably in terms of resources, capacities, and institutional organization, continue to pose significant challenges to the effective implementation of responses."); Alterpresse, *Haïti : L'Ocnh dénonce les défaillances de la justice et de l'état civil dans la Grande Anse et les Nippes* (Aug. 19, 2026), https://www.alterpresse.org/Haiti-L-Ocnh-denonce-les-defaillances-de-la-justice-et-de-l-etat-civil-dans-la-Grand-Anse-et-les-Nippes (courts in the Grand'Anse and Nippes Departments face "a significant lack of vehicles and resources, which would allow for the extraction, transfer and regular presentation of defendants before the courts"); RNDDH, *Situation préoccupante sur l'île de La Gonâve : Le RNDDH presse le CSPN et le CSPJ d'intervenir*, ¶¶ 6, 10-11, 61 (Aug. 17, 2026), https://web.rnddh.org/situation-preoccupante-sur-lile-de-la-gonave-le-rnddh-presse-le-cspn-et-le-cspj-dintervenir/?lang=en (the Magistrate's Courts in Pointe-à-Raquette and Anse-à-Galets, communes in the

island of Gonâve, are in states of "advanced disrepair" and lack office supplies, transportation, and electricity; "numerous requests made to state authorities have gone unanswered, as the authorities have chosen to retain all equipment for their own operations"). According to information shared by ORDEDH, security measures are not guaranteed for *magistrats debouts* (prosecutors) or *magistrat assis* (sitting judges). According to the BAI's Dieunel Fleury Jean, salaries are insufficient, particularly in light of high inflation, and that the lack of transportation for judges makes it impossible for them to conduct investigative activities in the field and exposes them to threats and attacks. (Notes on file with authors).

[178] According to information shared by the BAI's Dieunel Fleury Jean, "when strikes occur no trials can take place, no judgments. It is enough for court clerks or magistrates to go on strike for the entire system to become paralyzed." (Notes on file with authors). *See also* BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, p. 17 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (the Collective of Haitian Prosecutors, which ended a three-month long strike in February 2026, indicated that its demands still had not been met and that further strikes were possible).

[179] According to information shared by the BAI on file with authors. *See also* Alterpresse, *Haïti : L'Ocnh dénonce les défaillances de la justice et de l'état civil dans la Grande Anse et les Nippes* (Aug. 19, 2026), https://www.alterpresse.org/Haiti-L-Ocnh-denonce-les-defaillances-de-la-justice-et-de-l-etat-civil-dans-la-Grand-Anse-et-les-Nippes (the "absenteeism" of some Peace Court magistrates has led to cases being "allegedly improperly entrusted to clerks"); *but see* BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 20 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting that the Superior Council of the Judiciary (**CSPJ**) "formalized the appointment, renewal of mandates, or promotion of 120 magistrates" in May 2026).

[180] *See* notes 198-199.

[181] Haiti Protection Cluster, *Haiti Protection Analysis Update*, pp. 4-5 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update; Coalition of Haitian and Solidarity Human Rights Organizations, *Submission to the United Nations Human Rights Council Universal Periodic Review Re Haiti Justice Sector*, pp. 4-5 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Justice-Sector-by-HaitiHumanRightsCoalition-EN.pdf ("Corruption permeates the Haitian justice system at every level, reflecting, and in turn further enabling, institutional weakness. . . . Executive control over the judicial budget and appointments enables enormous pressure on and control over judges and proceedings. The executive has politically weaponized the appointment and renewal process for judicial mandates: for example, mandates of judges working on cases implicating government-connected individuals have been allowed to lapse, thereby stalling the underlying investigations."); Edouard Paultre, *How corruption has captured the Haitian state*, AJWS, https://ajws.org/stories/how-corruption-has-captured-the-haitian-state/ (last visited Oct. 19, 2026) ("The justice system rarely functions in corruption cases—-not because of a lack of legal expertise, but because of political pressure, intimidation, and chronic under-resourcing."); *see generally* RNDDH, *Correspondance au CSPJ autour des préoccupations du RNDDH sur l'instruction judiciaire relative à l'assassinat du président Jovenel Moïse* (2026), https://web.rnddh.org/wp-content/uploads/2026/06/CSPJ-Correspondances-diverses.Jan-a-Jun-2026.pdf; *see also* note 144 (corrupt lawyers, prosecutors, and judges in the Grand'Anse Department reportedly ensure impunity for defendants in land theft cases).

[182] Le Nouvelliste, *Justice: 119 magistrates certified out of 159 files, 17 certifications refused by the CSPJ* (Sep. 23, 2026), https://lenouvelliste.com/en/article/272250/justice-119-magistrates-certified-out-of-159-files-17-certifications-refused-by-the-cspj (in September, the CSPJ rejected the recertification of 17 magistrates "for reasons related to their professional and moral integrity"); Mederson Alcindor, *Haïti-Justice : le CSPJ maintient 26 non-certifications et valide six dossiers de magistrats*, Vant Bèf Info (Jun. 6, 2026), https://vantbefinfo.com/haiti-justice-le-cspj-maintient-26-non-certifications-et-valide-six-dossiers-de-magistrats/ (in June, the CSPJ rejected the recertification of 26 magistrates).

[183] According to information shared by the BAI's Dieunel Fleury Jean, "there is a kind of arrangement among Haitian politicians. The oligarchy – those who hold economic and political power – ensures that they are exempt from all criminal and civil proceedings related to corruption and other offenses." (Notes on file with authors). *See also* UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 100, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("In most cases of [arms trafficking] violations previously reported by the Panel, suspects have been released despite overwhelming evidence, investigations have been derailed by pressure from influential actors, and no prosecutions have ever resulted in any charges"); RNDDH, *Situation préoccupante sur l'île de La Gonâve : Le RNDDH presse le CSPN et le CSPJ d'intervenir*, ¶¶ 13, 43-46, 57 (Aug. 17, 2026), https://web.rnddh.org/situation-preoccupante-sur-lile-de-la-gonave-le-rnddh-presse-le-cspn-et-le-cspj-dintervenir/?lang=en (offering examples of multiple individuals implicated in grave crimes, including child sexual abuse, being released despite incriminating evidence, sometimes because they paid bribes or were members of an armed group); Charilien Jeanvil, *Haïti : L'ambassadeur français Antoine Michon alerte sur l'imbrication entre criminalité et sphère politique*, Alterpresse (Aug. 3, 2026), https://www.alterpresse.org/Haiti-L-ambassadeur-Antoine-Michon-alerte-sur-l-imbrication-entre-criminalite-et-sphere-politique (the then-French ambassador to Haiti "denounced judicial proceedings that are struggling to result in convictions, while some alleged perpetrators of crimes are acquitted"); RNDDH, *Affaire Romel BELL, Anna DORVIL BELL et Duken AUGUSTIN : La Justice haïtienne demeure le plus grand obstacle à la lutte contre la corruption* (May 8, 2026), https://web.rnddh.org/affaire-romel-bell-anna-dorvil-bell-et-duken-augustin-la-justice-haitienne-demeure-le-plus-grand-obstacle-a-la-lutte-contre-la-corruption/?lang=en (in November 2025, the Port-au-Prince Court of Appeals overturned a 2024 ruling referring former Director General of the General Customs Administration Romel Bell and co-defendants to stand trial before a criminal court for corruption, based on procedural irregularities; RNDDH calls the decision to dismiss the case against Bell outright rather than remand the case to a different investigating judge an "excessively lenient ruling . . . [that] serves as proof that the Haitian justice system remains the greatest obstacle to this fight [against corruption]").

[184] According to information shared by ORDEDH, "the politicization of the judiciary is blatantly evident in the mechanism for assigning criminal cases. Within the Port-au-Prince Court of First Instance, the presiding judge acts as a de facto political figure by using his discretionary authority to assign sensitive cases. By systematically assigning politically sensitive cases to

investigating judges known to be compliant or sympathetic to his cause, he exploits the criminal justice system, thereby ensuring impunity for certain allies or, conversely, relentless legal persecution of his opponents." (Notes on file with authors).

[185] Coalition of Haitian and Solidarity Human Rights Organizations, *Submission to the United Nations Human Rights Council Universal Periodic Review Re Haiti Justice Sector*, p. 4 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Justice-Sector-by-HaitiHumanRightsCoalition-EN.pdf.

[186] OHCHR, *Specialised judicial units in Haiti* (Jun. 2, 2026), https://www.ohchr.org/en/press-briefing-notes/2026/06/specialised-judicial-units-haiti ("[M]agistrates and justice officials have been the victims of attacks and death threats from these [armed] groups."); Juhakenson Blaise, *Haitian journalist, lawyer and government official kidnapped within 24 hours*, Haitian Times (Sep. 9, 2026), https://haitiantimes.com/2026/09/09/haitian-journalist-lawyer-government-official-kidnapped-within-24-hours/ (the kidnapping of a lawyer in September has "drawn renewed attention to the risks faced by . . . legal professionals . . . as armed groups continue to carry out kidnappings in the capital and provincial communities."); International Observatory of Lawyers at Risk, *HAITI: Assassination attempt on Mr Ronel Telsyde, President of the Haitian Bar Federation (FBH)* (Apr. 17, 2026), https://protect-lawyers.org/en/case/ronel-telsyde/ (reporting an assassination attempt against the sitting president of Haiti's National Bar Federation on April 13, 2026, and noting that the attack sends "a threatening message to all lawyers and is likely to have a deterrent effect on the independent practice of their profession").

[187] *See* Section V.

[188] Pierre Espérance, *Haiti's New Courts Could Change Everything — Or Nothing At All*, Just Security (Jul. 23, 2026), https://www.justsecurity.org/148702/haiti-specialized-courts-vetting/ (describing a system "that has repeatedly avoided justice"); Rhinews, *Six ans après le double assassinat de Norvella Bellamy et de sa compagne Daphnée Fils-Aimé, une enquête toujours ouverte mais sans résultats tangibles…* (Jun. 27, 2026), https://www.rhinews.com/actualites/six-ans-apres-le-double-assassinat-de-norvella-bellamy-et-de-sa-compagne-daphnee-fils-aime-une-enquete-toujours-ouverte-mais-sans-resultats-tangibles/; RNDDH, *Correspondance au CSPJ autour des préoccupations du RNDDH sur l'instruction judiciaire relative à l'assassinat du président Jovenel Moïse*, pp. 3-4 (2026), https://web.rnddh.org/wp-content/uploads/2026/06/CSPJ-Correspondances-diverses.Jan-a-Jun-2026.pdf ("[T]he Haitian justice system, which—despite numerous appeals from victims of massive human rights violations—has done nothing to ensure that those identified as members of the armed gangs sowing grief and terror are tried and convicted. It is also the Haitian judiciary that has chosen to systematically turn a blind eye to corruption cases and, in doing so, to protect those who have scandalously plundered the state's coffers. . . . [T]he legendary apathy of the judges, which had been observed in the West, is also evident in Artibonite and the Central region: no convictions—not even in absentia— have been handed down here or elsewhere against these terrorists, not even against the most notorious ones."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 34 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74.

[189] BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 21 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026.

[190] For an overview, see IJDH, *Human Rights Update – June 2022*, pp. 7-8 (Jun. 2022), https://www.ijdh.org/wp-content/uploads/2022/06/IJDH-Human-Rights-Update-June-2022.pdf; IJDH, *Human Rights Update – December 2023*, pp. 5-6 (Dec. 2023), https://www.ijdh.org/wp-content/uploads/2023/12/IJDH-HRU-Dec.-2023-12.11-FINAL.pdf; IJDH, *Human Rights Update – June 2024*, p. 7 (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; IJDH, *Human Rights Update – March 2026*, note 169 (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf; *see also* RNDDH, *Assassinat du président Jovenel MOÏSE : Le transfert des détenus inculpés est une honte pour la Justice haïtienne* (Oct. 1, 2026), https://web.rnddh.org/assassinat-du-president-jovenel-moise-le-transfert-des-detenus-inculpes-est-une-honte-pour-la-justice-haitienne/?lang=en; Evens Sanon & Dánica Coto, *18 suspects accused in the 2021 killing of Haiti's president being extradited from Haiti to U.S.*, PBS (Sep. 20, 2026), https://www.pbs.org/newshour/world/18-suspects-accused-in-the-2021-killing-of-haitis-president-being-extradited-from-haiti-to-u-s; Charilien Jeanvil, *Haïti : L'ambassadeur français Antoine Michon alerte sur l'imbrication entre criminalité et sphère politique*, Alterpresse (Aug. 3, 2026), https://www.alterpresse.org/Haiti-L-ambassadeur-Antoine-Michon-alerte-sur-l-imbrication-entre-criminalite-et-sphere-politique (then-French ambassador to Haiti "lamented the slow pace of the investigation into the assassination of former president Jovenel Moïse"). Rights organizations also warn that a search order targeting the offices of RNDDH and its Executive Director threatens confidential testimony and civic space. Rhinews, *La POHDH dénonce les perquisitions visant le RNDDH dans l'enquête sur l'assassinat de Jovenel Moïse…* (Jul. 24, 2026), https://www.rhinews.com/actualites/la-pohdh-denonce-les-perquisitions-visant-le-rnddh-dans-lenquete-sur-lassassinat-de-jovenel-moise/ (POHDH "expresses deep concerns regarding the credibility of the legal proceedings undertaken and the respect for the principles of impartiality, independence and integrity in the handling of the case," and says the search is "a clear attempt to cast unjustified suspicion on the RNDDH") (*internal quotations omitted*); RNDDH, *Correspondance au CSPJ autour des préoccupations du RNDDH sur l'instruction judiciaire relative à l'assassinat du président Jovenel Moïse*, pp. 7-8 (2026), https://web.rnddh.org/wp-content/uploads/2026/06/CSPJ-Correspondances-diverses.Jan-a-Jun-2026.pdf (calling the search "disproportionate and in violation of constitutional guarantees," and highlighting "troubling information brought to the RNDDH's attention [which] suggests that certain actions taken as part of this investigation may have given rise to corrupt practices and financial transactions between the investigating judge and defendants—some of whom participated in meetings with him—facilitated outside the Investigating Chamber by another well-known judge").

[191] In September 2026, with proceedings in Haiti facing "significant difficulties," Haiti extradited 18 suspects to the United States, where 12 people have been convicted in federal court and dozens more are awaiting trial. David Fischer, *What to know as trials over the assassination of Haiti's president resume in Miami*, Miami Herald (Sep. 28, 2026), https://apnews.com/article/haiti-president-assassination-trial-miami-a0a7fbdc212561d1e177c53467e35eaf; Evens Sanon & Dánica Coto, *18 suspects accused in the 2021 killing of Haiti's president being extradited from Haiti to U.S.*, PBS (Sep. 20, 2026), https://www.pbs.org/newshour/world/18-suspects-accused-in-the-2021-killing-of-haitis-president-being-extradited-from-haiti-to-u-s; BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 21 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (prior to

the extradition, the investigating judge "continued hearings of witnesses and suspects as part of the re-examination of the case ordered by the Port-au-Prince Court of Appeal on 13 October 2025" and "requested the intervention of the Central Directorate of the Judicial Police (DCPJ) to execute arrest warrants issued against seven [suspects]"); Rhinews, *Un juge inculpe le journaliste Jean Monard Métellus pour implication présumée dans l'assassinat de Jovenel Moïse et le convoque au cabinet d'instruction…* (Jun. 2, 2026), https://www.rhinews.com/actualites/un-juge-inculpe-le-journaliste-jean-monard-metellus-pour-implication-presumee-dans-lassassinat-de-jovenel-moise-et-le-convoque-au-cabinet-dinstruction/ ("No final judicial decision has yet established the guilt of anyone in this case in Haiti."); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, pp. 18-19 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026.

[192] BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, pp. 3, 18 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 ("The proceedings had been suspended in October 2025 following the referral of the case by the investigating judge to the public prosecutor of Port-au-Prince. In March 2026, the public prosecutor issued submissions in favor of the issuance of arrest warrants against ten individuals and forwarded the case back to the investigating chamber, allowing the judicial investigation to continue."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 34 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("17 witnesses and relatives of victims have testified before the investigating judge, but no arrests have been made yet, pending the issuance of arrest warrants.").

[193] These include massacres in Grand Ravine (2017), La Saline (2018), Bel Air (2019), and Pont Sondé (2024). BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 21 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026; Charilien Jeanvil, *Haïti : L'ambassadeur français Antoine Michon alerte sur l'imbrication entre criminalité et sphère politique*, Alterpresse (Aug. 3, 2026), https://www.alterpresse.org/Haiti-L-ambassadeur-Antoine-Michon-alerte-sur-l-imbrication-entre-criminalite-et-sphere-politique; Pierre Espérance, *Haiti's New Courts Could Change Everything — Or Nothing At All*, Just Security (Jul. 23, 2026), https://www.justsecurity.org/148702/haiti-specialized-courts-vetting/ ("A Haitian investigative judge charged both officials and the gang leader, among dozens of others, with crimes related to the [La Saline] attack — but none has ever stood trial, despite a United Nations investigation and U.S. sanctions."); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, pp. 18-19 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026; UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 34 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("No concrete action has been taken [in the case of Pont Sondé], and survivors have received no support.").

[194] Pierre Espérance, *Haiti's New Courts Could Change Everything — Or Nothing At All*, Just Security (Jul. 23, 2026), https://www.justsecurity.org/148702/haiti-specialized-courts-vetting/ ("A decade after the first report by the Haitian Senate on the massive PetroCaribe corruption scandal, involving the squandering of billions of dollars of public funds, no one has been convicted.").

[195] Dorval was shot and killed outside his home hours after he had publicly denounced the PHTK government's management of the country. BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, pp. 18-19 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (after being "blocked for more than three years following the recusal of the four previously assigned judges," the investigation remains in its early stages; no perpetrators have been arrested).

[196] Unidentified individuals shot and killed journalist Diego Charles and political activist Antoinette Duclair on June 29, 2021. Over five years later, "no information about the status of the investigation" and no one has been held accountable. Juhakenson Blaise, *Nègès Mawon renews calls for justice for slain Haitian journalist Antoinette Duclaire*, Haitian Times (Jul. 1, 2026), https://haitiantimes.com/2026/07/01/neges-mawon-commemorates-antoinette-duclaire-calls-for-justice/.

[197] *See* Pierre Espérance, *Haiti's New Courts Could Change Everything — Or Nothing At All*, Just Security (Jul. 23, 2026), https://www.justsecurity.org/148702/haiti-specialized-courts-vetting/ ("[E]ven before the new specialized courts have been established, they face two fundamental obstacles. A recent government decree could strip them of jurisdiction over Haiti's top leaders. And some of the judges and prosecutors named to staff the courts have been linked with the very corruption, gang collusion, and illegal exchanges of favors they are expected to root out. The danger is that these new courts will never hold powerful Haitians accountable – producing yet another internationally backed failure."). Adopted by decree on March 1, 2020 despite widespread concerns about unconstitutionality, the new Penal Code and Code of Criminal Procedure have been repeatedly postponed: first in 2022 by the Henry government, which announced commissions to review them, then in January 2024, when their entry into force was pushed back to 2025, then again in December 2025 to avoid "legal uncertainty." They are now set to go into effect January 1, 2027. Michael Chalupovitsch, *Haiti: New Criminal Code Comes Into Force*, Library of Congress (Jul. 28, 2022), https://www.loc.gov/item/global-legal-monitor/2022-07-28/haiti-new-criminalcode-comes-into-force/; BINUH, *Quarterly Report on the Human Rights Situation in Haiti (October – December 2025)*, p. 17 (Jan. 30, 2026), https://binuh.unmissions.org/sites/default/files/2026-01/Quarterly%20Report%20on%20the%20human%20rights%20situation%20in%20Haiti%20%28October%20-%20December%202025%29%20-%20ENGLISH_0.pdf; Jean Junior Celestin, *New Penal Code Implementation Delayed to June 2025*, Le Nouvelliste (June 24, 2024), https://lenouvelliste.com/en/article/248793/new-penal-code-implementation-delayed-to-june-2025; RHI News, *Haïti : la rentrée judiciaire 2026-2027 s'ouvre sur fond de « réformes » et d'impunité…*, ¶ 10 (Oct. 5, 2026), https://www.rhinews.com/actualites/haiti-la-rentree-judiciaire-2026-2027-souvre-sur-fond-de-reformes-et-dimpunite/; Haiti Libre, *Haïti - Justice : Préparatoires à la mise en œuvre des nouveaux code pénal et de procédure penal* (Jul. 17, 2026), https://www.haitilibre.com/article-48008-haiti-justice-preparatoires-a-la-mise-en-oeuvre-des-nouveaux-code-penal-et-de-procedure-penal.html; IJDH, *Human Rights Update – July 2025*, note 5 and associated text (Jul. 2025), https://www.ijdh.org/wp-content/uploads/HRU-July-2025.pdf.

[198] Preparations include the inauguration of the building housing the specialized units, the appointment of ten deputy public prosecutors and six investigating judges, and the initiation of "a process to inventory existing case files with a view to transferring them to these specialized units." BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, pp. 20-21 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026; *see also* UN, *OHCHR/Türk Haiti* (Oct. 2, 2026), https://media.un.org/unifeed/en/asset/d363/d3638971 (UN Human Rights Chief Volker Türk urged Haitian authorities to make the specialized units fully operations); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 29 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (noting delays in the appointment of the ten public prosecutors "due to setbacks in acquiring the building designated for the units").

[199] Pierre Espérance, *Haiti's New Courts Could Change Everything — Or Nothing At All*, Just Security (Jul. 23, 2026), https://www.justsecurity.org/148702/haiti-specialized-courts-vetting/ (one of the selected judges, Bernard Saint-Vil, presided over stalled corruption and armed group violence cases that had "signs of insider involvement" and "manipulated cases by steering them to favored judges and attempting to influence outcomes;" another, Raymond Jean Michel, "was found to have improperly handled the case of a politically connected alleged kidnapper. . . . [and] dismissed corruption charges against former Customs Director-General Romel Bell on procedural grounds"); RNDDH, *Correspondance au CSPJ autour des préoccupations du RNDDH sur l'instruction judiciaire relative à l'assassinat du président Jovenel Moïse*, pp. 5-6 (2026), https://web.rnddh.org/wp-content/uploads/2026/06/CSPJ-Correspondances-diverses.Jan-a-Jun-2026.pdf (some of the individuals appointed to be public prosecutors "are not members of the judiciary and were selected in violation of Articles 2, 3, and 4 of the Decree establishing the centers"); *see also id.* at p. 3 (asking the CSPJ to "clarify the selection criteria . . . used [to appoint judicial staff to the units]" and urging the body "to involve civil society organizations in the process to ensure its credibility"). The units were also criticized when they were first created for failing to consider the corruption and structural challenges that are at the root of Haiti's judicial dysfunction. It is also not clear whether recruitment for the units risks disrupting staffing for the already under-staffed and under-resourced judiciary system as a whole. IJDH, *Human Rights Update – July 2025*, note 211 (Jul. 2025), https://www.ijdh.org/wp-content/uploads/HRU-July-2025.pdf.

[200] BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 23 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026. Overcrowding is exacerbated by government failures to restore prison capacity after armed group attacks forced major prisons to close – there are now just 14 operational prisons in Haiti holding approximately 7,294 individuals. Relying on inputs from the BAI's Dieunel Fleury Jean on file with authors. *See also* Haiti Libre, *Haïti - Justice : Nombre des personnes privées de liberté dans les prisons du pays* (Jun. 20, 2026), https://www.haitilibre.com/article-47797-haiti-justice-nombre-des-personnes-privees-de-liberte-dans-les-prisons-du-pays.html; UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 37 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (noting the impact of "the 2024 mass escapes from the National Penitentiary and the Croix-des-Bouquets Prison for adults – facilitated by gang attacks that rendered both facilities inoperable" on overcrowding). The Haitian government's contract with Metric Correctional Facility S.A. to build and rent three new prisons will, if fulfilled, increase prison capacity. *See* note 151.

[201] BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 23 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026.

[202] BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 23 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (this includes 668 adults and 92 children); Défenseurs Plus, *Rapport situationnel Sur le conditions de detention des détenu.e.s au CERMICOL*, pp. 17-20, 34 (Jul. 2026), https://defenseursplus.org/en/publications/situational-report-on-the-conditions-of-detention-of-detainees-at-the-reeducation-center-for-minors-in-conflict-with-the-law-cermicol-march-june-2026 (reporting 778 individuals detained in CERMICOL, including 154 women, 95 children, and 529 men, and noting that severe overcrowding means incarcerated individuals are sleeping in hallways, the shower area, and the infirmary, with some "forced to sleep suspended in a sheet"); *see also* UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 37 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (reporting 617 people, 605 of whom are adults, as of December 2025). According to information shared by the BAI's Dieunel Fleury Jean, children being detained range between the ages of 8 and 16 and are often forced to share cells with adults, which is a violation of international law. (Notes on file with authors).

[203] According to information shared by Michelle Karshan, Executive Director of Alternative Chance/*Chans Altenativ*, in one instance, police cuffed a woman to furniture because there was no cell space. (Notes on file with authors).

[204] Wedster Lyvert, *Gangs Free Hundreds of Hostages in Exchange for the Release of Their Associates*, Le Nouvelliste (Sep. 28, 2026), https://lenouvelliste.com/en/article/272384/gangs-free-hundreds-of-hostages-in-exchange-for-the-release-of-their-associates (according to human rights defender Bertide Horace, two individuals arrested for being affiliated with armed groups were not taken to the police station, and instead kept in a house).

[205] *See* BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 23 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting that related "releases . . . had only a limited impact on prison overcrowding at CERMICOL"); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, p. 20 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026; UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 36 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74.

[206] Haiti Protection Cluster, *Haiti Protection Analysis Update*, pp. 4-5 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (describing pre-trial detention rates as "among the highest in the world"); BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 23 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026; BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, p. 20 (May 8, 2026),

https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026; *see also* Défenseurs Plus, *Rapport situationnel Sur le conditions de detention des détenu.e.s au CERMICOL*, pp. 26-29 (Jul. 2026), https://defenseursplus.org/en/publications/situational-report-on-the-conditions-of-detention-of-detainees-at-the-reeducation-center-for-minors-in-conflict-with-the-law-cermicol-march-june-2026 ("[T]he vast majority of individuals deprived of their liberty at CERMICOL remain awaiting trial. . . . Several detainees interviewed during the investigation stated that they had been incarcerated for 15 years or more without having received a final judgment on their criminal status.").

[207] *See* UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 30, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("The Gang Suppression Force made its first arrests in mid-June and transferred individuals to the Haitian National Police, which created challenges for the police and the judicial system with respect to absorbing the likely high number of upcoming cases."); ICRC, *Haiti: Everything must be done to protect the population from escalating gang violence* (Aug. 19, 2026), https://www.icrc.org/en/article/haiti-do-everything-possible-protect-population-effects-escalating-armed-violence ("[O]ffensive operations could. . . . cause an increase in the number of people imprisoned for violent crimes, overwhelming a prison system that is already at capacity and in which conditions are deteriorating."); Pierre Espérance, *Haiti's New Courts Could Change Everything — Or Nothing At All*, Just Security (Jul. 23, 2026), https://www.justsecurity.org/148702/haiti-specialized-courts-vetting/ (noting the urgency of reforming Haiti's justice system "as the new U.N.-backed Gang Suppression Force deploys, because arresting gang members is futile without a justice system capable of detaining, trying, and convicting them").

[208] UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 38 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("Prolonged detention of children in conflict with the law remains pervasive, despite national and international standards requiring inter alia that it be used only as a measure of last resort and for the shortest appropriate period. This is largely due to limited awareness among competent authorities of the standards governing juvenile justice and the absence of viable alternatives to detention. Delays in prosecuting cases, linked to shortages of judicial personnel and resources, mean that many juveniles spend much of their childhood in prison, in harsh conditions and without access to adequate education or rehabilitation programmes."); *see also* Défenseurs Plus, *Rapport situationnel Sur le conditions de detention des détenu.e.s au CERMICOL*, pp. 33, 35-36 (Jul. 2026), https://defenseursplus.org/en/publications/situational-report-on-the-conditions-of-detention-of-detainees-at-the-reeducation-center-for-minors-in-conflict-with-the-law-cermicol-march-june-2026 (educational and vocational initiatives at CERMICOL "remain insufficient to meet the needs of the entire prison population and ensure effective access to reintegration programs that align with the objectives of prison policy and human rights standards;" men, in particular, "are excluded from all educational activities," making their eventual reintegration into society much more difficult, and overcrowding "significantly reduces opportunities for supervision, rehabilitation, and personal development for children in conflict with the law[,] . . . exacerbating their vulnerability and permanently jeopardizing their prospects for social reintegration"); *but see* Junior Legrand, *Children in Prison excel in Official Exams in Haiti*, AyiboPost (Apr. 30, 2026), https://ayibopost.com/children-in-prison-excel-in-official-exams-in-haiti/ (children in CERMICOL's school have maintained a high pass rate in Haiti's official Ninth Fundamental Year exams for 15 years running, although advocates say overcrowding has weakened the prison's education component; demands to extend the school beyond year nine were rejected by the central prison administration "because of insufficient funding, lack of adequate infrastructure able to host the four additional secondary-school grades, and a shortage of teachers to cover the new subjects").

[209] BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 23 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 ("Conditions of detention remain inhuman and degrading."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 37 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74; Défenseurs Plus, *Rapport situationnel Sur le conditions de detention des détenu.e.s au CERMICOL*, pp. 20-23 (Jul. 2026), https://defenseursplus.org/en/publications/situational-report-on-the-conditions-of-detention-of-detainees-at-the-reeducation-center-for-minors-in-conflict-with-the-law-cermicol-march-june-2026 (reporting "difficulties related to waste management," no designated space to wash clothing, unreliable electricity exacerbating ventilation problems, and inadequate access to food, clean water, and healthcare); *see also* iciHaiti, *Serious and deadly ventilation problems at Jacmel prison* (Aug. 29, 2026), https://www.icihaiti.com/en/news-48323-serious-and-deadly-ventilation-problems-at-jacmel-prison.html (reporting rehabilitation work at Jacmel prison to address "serious ventilation problems" at the Jacmel Civil Prison that have caused "several cases of asphyxiation").

[210] According to information shared by Michelle Karshan, Executive Director of Alternative Chance/*Chans Altenativ*, in the national prisons "they don't feed you and they don't give you water." She also noted that incarcerated armed group members control access to "everything" in prisons, including food. According to Laurore Michel, Executive Director of Haitian human organization *Association Haïtienne de défense des droits des prisonniers* (**AHDEDP**), sometimes churches or civil society organizations bring food, and sometimes government officials provide food, but the rations aren't nutritionally balanced. (Notes on file with authors). Défenseurs Plus, *Rapport situationnel Sur le conditions de detention des détenu.e.s au CERMICOL*, pp. 21-22 (Jul. 2026), https://defenseursplus.org/en/publications/situational-report-on-the-conditions-of-detention-of-detainees-at-the-reeducation-center-for-minors-in-conflict-with-the-law-cermicol-march-june-2026 ("[T]he water supply [in CERMICOL] frequently depends on donations from outside sources, particularly religious leaders. This method of access does not ensure a constant supply of water for consumption. . . . Some inmates save small amounts of water collected during shower times to meet their immediate needs. Others obtain water through informal networks within the prison grounds. . . . Although meals are provided daily, some concerns remain regarding whether the quantities distributed adequately meet the inmates' actual needs."); *cf.* Junior Legrand, *Children in Prison excel in Official Exams in Haiti*, AyiboPost (Apr. 30, 2026), https://ayibopost.com/children-in-prison-excel-in-official-exams-in-haiti/ (describing "members of humanitarian organizations" handing out food at the CERMICOL prison).

[211] According to information shared by knowledgeable local on file with authors. *See also* Défenseurs Plus, *Rapport situationnel Sur le conditions de detention des détenu.e.s au CERMICOL*, pp. 21-22 (Jul. 2026), https://defenseursplus.org/en/publications/situational-report-on-the-conditions-of-detention-of-detainees-at-the-reeducation-center-for-minors-in-conflict-with-the-law-cermicol-march-june-2026 (some detainees at the CERMICOL prison are forced to

buy their water for 250 to 500 gourdes per container; "[t]his situation places inmates in a position of dependence on external resources or their own financial means, even though access to drinking water is a fundamental requirement of minimum standards of detention").

[212] According to information shared by Michelle Karshan, Executive Director of Alternative Chance/*Chans Altenativ* on file with authors. *See also* Défenseurs Plus, *Rapport situationnel Sur le conditions de detention des détenu.e.s au CERMICOL*, pp. 19, 23-24, 36-37 (Jul. 2026), https://defenseursplus.org/en/publications/situational-report-on-the-conditions-of-detention-of-detainees-at-the-reeducation-center-for-minors-in-conflict-with-the-law-cermicol-march-june-2026 ("CERMICOL's health services operate on a limited basis and struggle to ensure continuity of care," leading to recurring health issues for many of those incarcerated there, especially those with intersecting vulnerabilities or chronic illnesses; "the lack of specialized mental health services constitutes a significant obstacle to protecting the right to health of detainees and raises concerns regarding the care of detainees with specific psychological or psychiatric needs.").

[213] OHCHR, *High Commissioner Türk: We need all eyes on Haiti* (Oct. 2, 2026), https://www.ohchr.org/en/statements-and-speeches/2026/10/high-commissioner-turk-we-need-all-eyes-haiti; *see also* BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 23 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (49 died between April and June 2026); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, p. 20 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (18 died between January and April 2026); Charilien Jeanvil, *Haïti : L'ambassadeur français Antoine Michon alerte sur l'imbrication entre criminalité et sphère politique*, Alterpresse (Aug. 3, 2026), https://www.alterpresse.org/Haiti-L-ambassadeur-Antoine-Michon-alerte-sur-l-imbrication-entre-criminalite-et-sphere-politique (the then-French ambassador to Haiti "drew attention to the alarming situation in prisons, where many inmates are dying as a result of prolonged pretrial detention"); Dieulivens Jules, *Prison civile des Gonaïves: l'OPC plaide pour une relocalisation*, Le National (Sep. 8, 2026), https://www.lenational.org/article/politique/8373/prison-civile-des-gonaives-lopc-plaide-pour-une-relocalisation (overcrowding and poor hygiene conditions in the Gonaïves Civil Prison "have also been linked to several inmate deaths over the years"). According to information shared by Michelle Karshan, Executive Director of Alternative Chance/*Chans Altenativ*, many people starve to death in detention. (Notes on file with authors).

[214] Défenseurs Plus, *Rapport situationnel Sur le conditions de detention des détenu.e.s au CERMICOL*, pp. 30-31 (Jul. 2026), https://defenseursplus.org/en/publications/situational-report-on-the-conditions-of-detention-of-detainees-at-the-reeducation-center-for-minors-in-conflict-with-the-law-cermicol-march-june-2026 (working conditions for National Prison Administration staff "are particularly difficult and marked by numerous structural shortcomings," including cramped workplaces, poor ventilation, unreliable access to electricity, and overworking, which "reduce officers' effectiveness in carrying out their daily duties;" officers are "often forced to prioritize urgent security-related tasks at the expense of administrative oversight and support for inmates," compromising "access to basic services, internal movement, and compliance with certain procedures"); Junior Legrand, *Children in Prison xcel in Official Exams in Haiti*, AyiboPost (Apr. 30, 2026), https://ayibopost.com/children-in-prison-excel-in-official-exams-in-haiti/ ("[T]he country's prison centers operate with meager budgets and face structural challenges that weaken detention conditions.").

[215] Dieulivens Jules, *Prison civile des Gonaïves: l'OPC plaide pour une relocalisation*, Le National (Sep. 8, 2026), https://www.lenational.org/article/politique/8373/prison-civile-des-gonaives-lopc-plaide-pour-une-relocalisation (the Gonaïves Civil Prison, "already facing problems of overcrowding and difficult detention conditions," flooded after heavy rains in September, worsening conditions for those incarcerated there; the departmental director of Haiti's human rights ombudsman called for the urgent relocation of the prison).

[216] *See, e.g.*, Défenseurs Plus, *Rapport situationnel Sur le conditions de detention des détenu.e.s au CERMICOL*, pp. 25-26, 32 (Jul. 2026), https://defenseursplus.org/en/publications/situational-report-on-the-conditions-of-detention-of-detainees-at-the-reeducation-center-for-minors-in-conflict-with-the-law-cermicol-march-june-2026. According to information shared by AHDEDP's Executive Director, "cases of violence and serious mistreatment in detention happen every day." (Notes on file with authors).

[217] RNDDH, *Situation préoccupante sur l'île de La Gonâve : Le RNDDH presse le CSPN et le CSPJ d'intervenir*, ¶¶ 37-42, 47-50 (Aug. 17, 2026), https://web.rnddh.org/situation-preoccupante-sur-lile-de-la-gonave-le-rnddh-presse-le-cspn-et-le-cspj-dintervenir/?lang=en (in one incident, police officers tied up and severely beat three men they had detained inside the police station, one of whom died from his injuries; in another, officers beat two men during their arrest and while they were in custody, with one of them sustaining a broken rib).

[218] According to information shared by knowledgeable local organizations on file with authors, including Alternative Chance/*Chans Altenativ* and the BAI.

[219] According to information shared by knowledgeable local organizations. Michelle Karshan, Executive Director of Alternative Chance/*Chans Altenativ*, also noted that rape of gay detainees was facilitated by prison officials in the Omega prison, who would designate specific areas for rapes to occur; the Omega prison has since closed. (Notes on file with authors).

[220] According to information shared by knowledgeable local organizations on file with authors, including Alternative Chance/*Chans Altenativ* and ORDEDH.

[221] According to information shared by knowledgeable local organizations on file with authors, including AHDEDP and the BAI.

[222] "Haiti's women and girls continue to face wide-ranging violence, discrimination, and systemic exclusions in both private and public life. Consequently, they have less independent wealth and opportunities, which in turn makes them more vulnerable to external shocks like natural disasters and conflict, as they have fewer resources to fall back on or rebuild with. . . . Harmful cultural and social attitudes towards women, many deriving from colonialism and enslavement, persist" and serve to constrain women's opportunities and create a permissive environment for GBV." Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Joint Submission to the United Nations Human Rights Council Universal Periodic Review Re*

Women's Rights in Haiti, ¶¶ 7-21 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf; *see also, e.g.*, UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, p. 2 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf (reporting that "82.41 per cent of women in collective displacement sites are unemployed, yet they bear 65 per cent of household expenses"). Discriminatory cultural expectations and gendered limitations on education, livelihoods, and other socio-economic activities mean that women have fewer opportunities or are expected to undertake disproportionate care burdens, increasing their challenges and vulnerabilities. For example, local organizations working on women's rights further share that women often forego eating or receiving medical care in order to feed their children or otherwise preserve household financial resources, or are forced to undertake economic activities in dangerous areas. (Notes on file with authors). *See also* Mac Archer, *Displacement, Gendered Harm, and the Normalization of Crisis in Port-au-Prince, Haiti*, Mercy Corps, pp. 8-9 (Mar. 24, 2026), https://www.prosperglobal.org/sites/default/files/2026-03/crisis-analysis_displacement-gendered-harm-and-the-normalization-of-crisis-in-port-au-prince.pdf ("Food insecurity is near-universal in Haitian IDP sites. . . . The women described skipping meals to feed their families, borrowing food, and living with the constant anxiety of their children going to bed hungry."). Social and cultural permissiveness towards GBV likewise contributes to the epidemic quality of harms against women and girls in the present moment. *See, e.g.*, UN, *Panel of Experts Report to the UN Security Council*, UN Doc. S/2026/241, ¶ 33 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("[T]he phenomenon [of sexual and gender-based violence] is rooted in broader and deeply entrenched cultural and social norms."). For an extended discussion of present and historical dynamics – including impacts of enslavement and colonialism, see Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission on women's rights in Haiti (July 2026) by Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations to the UN Human Rights Council for Haiti's Universal Periodic Review* (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf; CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, pp. 1-8 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (analyzing the "histories shap[ing] the framework necessary for understanding GBV in Haiti[, which] is reproduced through institutions, cultural norms, economic structures, and interpersonal relationships simultaneously"; and concluding that "[i]n Haiti, patriarchal norms interact with legacies of colonial domination, economic desperation, and state collapse to produce conditions in which violence against women and girls is pervasive, while violence against men and boys, particularly those who do not conform to dominant masculinity norms, remains invisible and unadressed").

[223] Global Protection Cluster, *Haiti Protection Analysis Update*, pp. 2, 9 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (reporting that 96% of GBV survivors were women and girls); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, ¶ 75 (Sep. 8, 2026), https://docs.un.org/S/2026/714 (reporting that women and girls are the majority of GBV survivors); Global Protection Cluster et al., *Haïti Snapshot sur les incidents de violences basees sur le genre (VBG) - De avril à juin 2026* (Jul. 27, 2026), https://reliefweb.int/report/haiti/haiti-snapshot-sur-les-incidents-de-violences-basees-sur-la-genre-vbg-de-avril-juin-2026 (reporting women and girls as 97% of GBV survivors); UNICEF, *Haiti Humanitarian Situation Report No. 2 (Mid- Year), 30 June 2026*, p. 2 (Aug. 11, 2026), https://www.unicef.org/documents/haiti-humanitarian-situation-report-no-2-mid-year-30-june-2026 (of the 2,888 cases of GBV reported by the Protection Cluster between January and May 2026, women (84%) and girls (11%) accounted for 95% of the survivors); UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, p. 9 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf ("Women and girls represented 86.31 per cent of rape survivors.").

While it is clear that women and girls are the vast majority of GBV victims, it is possible that gendered dynamics around reporting obscure the true incidence affecting men and boys. *See* UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 10 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74; CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, p. 7-8 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (finding that available data shows women as the overwhelming majority of victims in reported GBV cases, but that "[t]hese figures almost certainly understate the reality, as stigma and the absence of male-inclusive reporting frameworks suppress disclosure"); *see also* Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportee ("Sexual violence directed at women, men, and children is also rampant. . . . [There is an] epidemic of rapes deployed after gangs conquer new territory, or against men who refuse to fight for them."). It is worth noting, that thre are forms of violence that disproportionately affect men and boys, including killing, kidnapping, and forced perpetration of abuses. *See, e.g.,* CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, pp. 13, 21-22 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (finding that available data shows women as the overwhelming majority of victims in reported GBV cases, but that "[t]hese figures almost certainly understate the reality, as stigma and the absence of male-inclusive reporting frameworks suppress disclosure").

[224] For an overview of gendered inequities and exclusions, including a dedicated discussion regarding participation in leadership and elected office, see Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission on women's rights in Haiti (July 2026) by Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations to the UN Human Rights Council for Haiti's Universal Periodic Review* (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf; CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, p. 30 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (describing historic and present limitations on women's political participation and observing that "[u]nderrepresentation in parliament, ministerial leadership, security institutions, and local government has constrained gender-responsive lawmaking and institutional reform"). *See also, e.g.*, UNFPA, *Women and girls must enjoy their rights and fair justice*

in Haiti (Mar. 11, 2026), https://haiti.unfpa.org/en/news/women-and-girls-must-enjoy-their-rights-and-fair-justice-haiti ("Haitian women remain underrepresented in political, economic, and institutional decision-making spheres. Stereotypes and prejudices continue to influence girls' lives from a very young age and hinder their full participation in public life."); Marie Frantz Joachim, *Haïti - Quand le symbole contredit la mission : Réflexion féministe autour de la nomination d'un homme à la Direction générale du Mcfdf*, AlterPresse (May 11, 2026), https://www.alterpresse.org/Quand-le-symbole-contredit-la-mission-Reflexion-feministe-autour-de-la-nomination-d-un-homme-a-la-Direction-generale-du (reporting that even the limited data available "shows that women remain a small minority within government structures – only 28.6% of public administration roles are occupied by women, even as government policy documents acknowledge "that women still lack the material and symbolic resources needed to participate equally in decision-making").

Notably, Haiti's transitional governments through its iterations have consistently fallen well short of equity – and even the 30% minimum quota for women's participation in all public roles required by the Constitution.

> Haiti's transitional governments since the assassination of President Moïse have marginalized women in leadership and decision-making, and failed to center women's specific needs, in violation of the Women, Peace, and Security Agenda. For example, no woman has held a top decision-making position in the transitional government: the sole woman serving in the now-defunct nine-member Transitional Presidential Council (TPC) had no vote and no women have served as – or were publicly considered for the role of – transitional Prime Minister. All the transitional cabinets have fallen short of gender parity and all but one (which had too few women but assigned multiple ministerial mandates) fell short of the 30% Constitutional minimum while relegating women to less powerful Ministries like Tourism, Haitians Living Abroad, and the marginalized Ministry on the Status and Rights of Women (**MCFDF**). The fact that several transitional cabinets came closer to meeting the Constitutional minimum than the last (20% female) cabinet under Moïse likely reflects forceful public pressure generated by civil society through a widely-supported Policy Framework for an Effective and Equitable Transition and numerous open letters. However, their principal demands for the empowered inclusion of women in leadership and the mainstreaming of gender-specific considerations in resolving Haiti's crisis (including tackling GBV) have been largely disregarded, even as the situation for women worsens.

Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission on women's rights in Haiti (July 2026) by Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations to the UN Human Rights Council for Haiti's Universal Periodic Review*, ¶¶ 17-18 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf; *see also* NÈGÈS MAWON et al, *Letter Re The dismissal of Mme Sandy François as Director General of the MCFDF: A decision that further undermines women's rights* (May 11, 2026), https://www.ijdh.org/wp-content/uploads/2026.05.11-PRESS-RELEASE-MCFDF-DISMISSAL.pdf (describing "a long series of practices that marginalize the rights of women and girls, in contradiction of policies formulated for an effective and equitable transition," and denouncing that "the exclusion of women from national governance is not a matter of chance, but a deliberate political choice").

[225] "For example, Haiti's latest [July] electoral decree does not sufficiently address women's systematic exclusion. There are no tangible measures to combat gendered political violence, even though it has impacted every past election. While several provisions incorporate the 30% Constitutional quota and offer some financial incentives for women's inclusion, the decree establishes no sanctions for non-compliance, even though the quota is historically violated by enormous margins. Further, some of the more recent provisions tightening financial and administrative criteria for party registration are likely to pose a disproportionate barrier to women without any corresponding measures to prevent gendered impact." Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission on women's rights in Haiti (July 2026) by Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations to the UN Human Rights Council for Haiti's Universal Periodic Review*, ¶ 19 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf (relying on inputs from knowledgeable local organizations, on file with authors). The decree was modified again on October 6 (after the reporting period for this Update), but contains no relevant improvements. *Cf.* Le Moniteur, *Decree Amending the Electoral Decree of June 2, 2026, As Amended by the Decree Of July 2, 2026* (Oct. 6, 2026), https://cephaiti.ht/wp-content/uploads/2026/10/DECRET-DU-6-OCTOBRE-2026-REVISANT-LE-DECRET-ELECTORAL-DU-2-JUIN-2026-MODIFIE-PAR-CELUI-DU-2-JUILLET-2026.pdf. As of October 19, all 16 of the registered candidates for the presidency were men, and women were acutely under-represented among parliamentary candidates – at just 14.8% of candidates for the Senate and 7.1% of candidates for the Chamber of Deputies. CEP, *Statistiques d'enregistrement des candidats* (last visited Oct. 19, 2026), https://cephaiti.ht/statistiques-enregistrement-des-candidats/ (showing that overall women were 27.9% of all candidates as of October 19). Notably, Haiti has historically had one of the lowest rates of Parliamentary equity in the world, with the last functioning Parliament just 2.5% female. Inter-Parliamentary Union, *Women in National Parliaments* (Feb. 1, 2019), http://archive.ipu.org/wmn-e/classif.htm.

Nominal – and even substantive – focus on the minimum quota provided by Haiti's Constitution is fundamentally insufficient to tackling this challenging issue: advocates point out that even where women are present, "they are often sidelined into secondary or logistical roles" or "expected to be silent and defer to men" after being included as a formality. Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission to the United Nations Human Rights Council Uniersal Periodic Review Re Women's Rights in Haiti*, ¶ 15 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf. Thus, the failure to focus on political violence and structural barriers to women's participation like equitable access to financial and logistical support and to go beyond nominal references to the Constitutional quota are particularly concerning given that these have consistently impeded women from equal participation as voters, candidates, and administrators – and are identified as ongoing points of concern by Haitian women's organizations and advocates. *See, e.g.*, Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission to the United Nations Human Rights Council Uniersal Periodic Review Re Women's Rights in Haiti*, ¶¶ 15-20, 31-33 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf (describing institutional, structural, and social barriers, including unaddressed political violence) ;CRAT,

"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti, p. 30 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (describing historic and present limitations on women's political participation and observing that "[u]nderrepresentation in parliament, ministerial leadership, security institutions, and local government has constrained gender-responsive lawmaking and institutional reform"); Haiti Libre, *Haiti - Elections : Strengthening women's participation in political life* (Sep. 16, 2026), https://www.haitilibre.com/en/news-48455-haiti-elections-strengthening-women-s-participation-in-political-life.html (reporting on consultations with the MCFDF where participants identified persistent obstacles to women's political participation, including insufficient financial and logistical support); La Question News, *Le MCFDF organise un atelier sur la participation des femmes au processus électoral* (Aug. 22, 2026), https://laquestionnews.com/le-mcfdf-organise-un-atelier-sur-la-participation-des-femmes-au-processus-electoral/ (reporting that at an MCFDF-organized workshop that included women's and feminist organizations and civil society, among others, participants "focused on the obstacles to women's participation, including violence, insecurity, discrimination, and difficulties accessing resources and decision-making bodies"). These failures do not only hurt Haiti's women and girls and violate their rights. They also threaten Haiti's future stability and prosperity. *See, e.g.*, IJDH, *Human Rights Update – March 2026*, note 200 and associated text (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf.

[226] OCHA, *Today's top news: Democratic Republic of the Congo, Occupied Palestinian Territory, Haiti* (Jul. 29, 2026), https://www.unocha.org/news/todays-top-news-democratic-republic-congo-occupied-palestinian-territory-haiti-0 ("This brings to 5,500 the total number of [GBV] incidents in the first half of the year. . . . This follows a sharp rise in gender-based violence last year, when partners recorded just over 8,000 incidents."); Global Protection Cluster, *Haiti Protection Analysis Update*, pp. 2, 9 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (reporting that GBV "remains alarmingly high and underreported" and "continues to deteriorate sharply"); *see also, e.g.*, UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, p. 3, ¶¶ 66-68, 75-77 (Sep. 8, 2026), https://docs.un.org/S/2026/714 (describing a sharp escalation of sexual violence, especially collective rape, since early 2026); Global Protection Cluster et al., *Haïti Snapshot sur les incidents de violences basees sur le genre (VBG) - De avril à juin 2026* (Jul. 27, 2026), https://reliefweb.int/report/haiti/haiti-snapshot-sur-les-incidents-de-violences-basees-sur-la-genre-vbg-de-avril-juin-2026 ("Incidents of GBV rose steadily during the first four months [of 2026], increasing by 129.1% from 560 in January to a peak of 1,283 in April."); Rhinews, *Haïti : plus de 5.500 cas de violences basées sur le genre recensés au premier semestre 2026, selon l'ONU…* (Jul. 29, 2026), https://www.rhinews.com/actualites/haiti-plus-de-5-500-cas-de-violences-basees-sur-le-genre-recenses-au-premier-semestre-2026-selon-lonu/ (reporting that the number of GBV cases reported just in the first six months of 2026 (over 5,500) is almost 70% of the total for 2025 as a whole).

[227] Among *reported* cases of GBV, sexual violence consistently predominates. *See, e.g.*, UN, *Daily Press Briefing by the Office of the Spokesperson for the Secretary-General* (Sep. 25, 2026), https://press.un.org/en/2026/db260925.doc.htm ("Sexual violence, including rape, accounted for 60 per cent of all [GBV] incidents reported in August."); Global Protection Cluster, *Haiti Protection Analysis Update*, p. 9 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update ("Rape remained the most prevalent form of GBV [between January and July]."); Global Protection Cluster et al., *Haïti Snapshot sur les incidents de violences basees sur le genre (VBG) - De avril à juin 2026* (Jul. 27, 2026), https://reliefweb.int/report/haiti/haiti-snapshot-sur-les-incidents-de-violences-basees-sur-la-genre-vbg-de-avril-juin-2026 (documenting that 71% of reported GBV between April and June was either rape or other forms of sexual assault); UN, *Report of the Secretary-General on the United Nations Integrated Office in Haiti,* UN Doc. S/2026/574, ¶¶ 51-52 (Jul. 14, 2026), https://www.unmissions.org/sites/default/files/2026-07/SG%20Report%20on%20the%20situation%20in%20Haiti%20%2814%20July%202026%29.pdf (documenting that of the GBV cases reported between March 1 to May 31, 71% involved rape or other forms of sexual assault); UNICEF, *Haiti Humanitarian Situation Report No. 2 (Mid- Year), 30 June 2026*, p. 2 (Aug. 11, 2026), https://www.unicef.org/documents/haiti-humanitarian-situation-report-no-2-mid-year-30-june-2026 (reporting that of the 2,888 cases of GBV recorded by the Protection Cluster between January and May 2026, approximately 68% involved rape cases). "But all forms of GBV remain widespread, even as attention and resources are focused mostly on conflict-related sexual violence." Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission on women's rights in Haiti (July 2026) by Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations to the UN Human Rights Council for Haiti's Universal Periodic Review*, ¶ 22 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf (reporting based on inputs from local organizations).

[228] Global Protection Cluster et al., *Haïti Snapshot sur les incidents de violences basees sur le genre (VBG) - De avril à juin 2026* (Jul. 27, 2026), https://reliefweb.int/report/haiti/haiti-snapshot-sur-les-incidents-de-violences-basees-sur-la-genre-vbg-de-avril-juin-2026 ("Between April and June 2026, 16 partners reported 3,335 GBV incidents in 41 communes and at one displacement site, an average of 37 new cases per day."); *see also* Global Protection Cluster, *Haiti Protection Analysis Update*, p. 2, 9 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (recording 6,337 incidents of GBV between January and July 31 notwithstanding underreporting); Global Protection Cluster et al., *Haïti Snapshot sur les incidents de violences basees sur le genre (VBG) - De avril à juin 2026* (Jul. 27, 2026), https://reliefweb.int/report/haiti/haiti-snapshot-sur-les-incidents-de-violences-basees-sur-la-genre-vbg-de-avril-juin-2026 (reporting a total of 5,527 GBV incidents in the first six months of 2026); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, ¶ 75 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("In Port-au-Prince, Médecins sans frontières treated 2,485 victims of sexual violence from January to May 2026. . . . The vast majority of victims were women and girls."); UNICEF, Haiti Humanitarian Situation Report No. 2 (Mid- Year), 30 June 2026, p. 2 (Aug. 11, 2026), https://www.unicef.org/documents/haiti-humanitarian-situation-report-no-2-mid-year-30-june-2026 ("[A]ccording to the Protection Cluster, between January and May 2026, a total of 2,888 cases of Gender-based Violence (GBV) were reported, which is at similar alarming levels as in 2025 (8100 from January to November 2025).").

[229] Global Protection Cluster, *Haiti Protection Analysis Update*, p. 10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update; UN, *Panel of Experts Report to the UN*

Security Council, UN Doc. S/2026/241, note 44 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241; BINUH, *Flash Report - Intensification of Gang Violence in the Plaine du Cul-de-Sac Area and Cité Soleil (March - July 2026)*, p. 3 (Aug. 6, 2026), https://binuh.unmissions.org/en/document-library/flash-report-intensification-of-gang-violence-in-the-plaine-du-cul-de-sac-1; OHCHR, *Recent killings stark reminder of persistent violence in Haiti* (Aug. 28, 2026), https://www.ohchr.org/en/press-briefing-notes/2026/08/recent-killings-stark-reminder-persistent-violence-haiti; UN, *Report of the Secretary-General on the United Nations Integrated Office in Haiti,* UN Doc. S/2026/325, ¶ 44 (Apr. 14, 2026), https://www.un.org/sexualviolenceinconflict/wp-content/uploads/2026/04/report/united-nations-integrated-office-in-haiti-report-of-the-secretary-general/8788fc76-904c-49e0-abe6-6bab89bcf2de.pdf ("Although 166 incidents [of sexual violence by armed individuals] occurred prior to the reporting period, they were disclosed to United Nations entities only later, demonstrating the challenge that survivors faced in seeking support and reporting sexual violence."); UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, p. 10 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf; Dorly Castaneda & María Antonia Cote, *Sexual and gender-based violence as a tool of criminal governance in Haiti*, GI-TOC (Sep. 18, 2026), https://globalinitiative.net/analysis/sexual-and-gender-based-violence-as-a-tool-of-criminal-governance-in-haiti/ ("Stigma, fear of reprisals and a lack of confidence in institutions all discourage the reporting of abuse."); UNFPA, *Women and girls must enjoy their rights and fair justice in Haiti* (Mar. 11, 2026), https://haiti.unfpa.org/en/news/women-and-girls-must-enjoy-their-rights-and-fair-justice-haiti; CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, pp. 28-21 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (describing social and structural barriers to reporting). Under-reporting is especially pronounced for sexual violence implicating armed groups. *See, e.g.,* BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, p. 17 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 ("Sexual violence, particularly gang-related sexual violence, nevertheless remains largely underreported due to fear of reprisals, social stigma, and lack of trust in the police and the judicial system.").

[230] *See, e.g.*, Global Protection Cluster, *Haiti Protection Analysis Update*, pp. 2, 9 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (reporting that 76% of GBV incidents recorded between January and July 2026 were committed by members of armed groups); Global Protection Cluster et al., *Haïti Snapshot sur les incidents de violences basees sur le genre (VBG) - De avril à juin 2026* (Jul. 27, 2026), https://reliefweb.int/report/haiti/haiti-snapshot-sur-les-incidents-de-violences-basees-sur-la-genre-vbg-de-avril-juin-2026 ("Alleged perpetrators are almost exclusively men (99%), mostly members of armed gangs (69%), followed by civilians (21%) and unknown profiles (10%).").

[231] *See, e.g.,* Global Protection Cluster, *Haiti Protection Analysis Update*, p. 9 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update ("In some instances, sexual violence was used by gangs during attacks on localities as a deliberate tool of subjugation and intimidation, and to force displacement. In other instances, it was used as a means of 'punishment' and to enforce compliance with gangs' criminal governance."); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, ¶¶ 49, 67, 76, p. 60 (Sep. 8, 2026), https://docs.un.org/S/2026/714 (reporting on use of GBV by armed groups for retaliation and punishment); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, p. 17 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 ("At least 176 cases of rape were documented in the context of clashes between gangs in the Plaine du Cul-de-Sac area. . . . These acts of extreme brutality were used as a form of 'punishment', targeting in particular female residents of areas under the control of rival gangs."); BINUH, *Haiti: The Intensification of Gang Violence in the Plaine du Cul-de-Sac Area and Cité Soleil Underscores the Urgent Need to Strengthen the Protection of the Population* (Aug. 6, 2026), https://binuh.unmissions.org/en/press-releases/haiti-lintensification-des-violences-des-gangs-dans-la-zone-de-la-plaine-du ("Between 6 March and 31 July 2026 . . . more than 176 women and girls were subjected to rape, including gang rape, by gang members, often as a form of 'punishment' because they lived in areas controlled by rival gangs."); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (January – March 2026)*, p. 15 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 ("Gangs also continued to use sexual violence to punish women and girls who opposed their orders. For example, on 11 February in Mariani, two women were severely beaten and then raped by members of the Grand Ravine gang for having repeatedly refused to engage in 'romantic relationships' with these individuals."); UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, p. 9 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf ("Evidence indicates that sexual violence is used as a means of intimidation and territorial control in affected areas."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 10 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("Gangs have also continued using sexual violence to spread fear among, subjugate and punish the population."); *see also* Dorly Castaneda & María Antonia Cote, *Sexual and gender-based violence as a tool of criminal governance in Haiti*, GI-TOC (Sep. 18, 2026), https://globalinitiative.net/analysis/sexual-and-gender-based-violence-as-a-tool-of-criminal-governance-in-haiti/ (arguing that that GBV against women and girls in Haiti is "systematic and intended to subject communities to so-called discipline, punish perceived opponents and reinforce gang authority," as well as "a central mechanism of the current system of criminal governance," and providing evidence with reference to analogues in Colombia civil war); Marion Bethel, *International Women's Day: Support for Haiti must focus on the security of women*, Miami Herald (Mar. 6, 2026), https://www.miamiherald.com/opinion/op-ed/article314950721.html (reporting that the IACHR Rapporteur on the Rights of Women opined that GBV "in Haiti is not a side effect of the crisis, but a tool for territorial control").

[232] *See, e.g.*, Global Protection Cluster, *Haiti Protection Analysis Update*, p. 9 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (reporting that 88% of the incidents of sexual violence by armed groups reported through MARA in the first six months of 2026 involved collective rape); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, ¶ 75 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (reporting on gathered evidence indicating that "[c]ollective rapes of women and girls by armed men constitute the majority of sexual violence cases treated by staff in medical facilities" in Port-au-Prince); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, p. 17 (Aug. 25, 2026),

https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (87% of the 754 incidents of sexual violence perpetrated by armed group members between April and June 2026 comprised of collective rapes); Global Protection Cluster et al., *Haïti Snapshot sur les incidents de violences basees sur le genre (VBG) - De avril à juin 2026* (Jul. 27, 2026), https://reliefweb.int/report/haiti/haiti-snapshot-sur-les-incidents-de-violences-basees-sur-la-genre-vbg-de-avril-juin-2026 (71% of reported rapes between April and June had multiple perpetrators); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (January – March 2026)*, p. 15 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (83% of the 292 documented victims of sexual violence perpetrated by armed group members between January and March 2026 involved collective rapes); *see also* Jacqueline Charles, *Aid cuts forcing women's groups worldwide to close. In Haiti, they are feeling the toll*, Miami Herald (Jul. 10, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316461717.html (describing the collective rape by eight men of a nine-year-old girl).

[233] *See, e.g.*, UN, *Report of the Secretary-General on the United Nations Integrated Office in Haiti,* UN Doc. S/2026/325, ¶ 23 (Apr. 14, 2026), https://www.un.org/sexualviolenceinconflict/wp-content/uploads/2026/04/report/united-nations-integrated-office-in-haiti-report-of-the-secretary-general/8788fc76-904c-49e0-abe6-6bab89bcf2de.pdf; UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 10 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (reporting on "coer[sion] into so-called 'sentimental relationships' with gang members" and "prolonged sexual exploitation"); UNSC 10190th Meeting, *Conflict-related Sexual Violence Still Widespread, Underreported, Speakers Warn Security Council, Urging Stronger Action beyond Condemnation* (Jul. 8, 2026), https://press.un.org/en/2026/sc16406.doc.htm ("Women and girls are systematically raped, trafficked and sexually exploited by gangs"); UN Women, *How aid cuts are threatening women's organizations responding to Haiti's gang violence* (Aug. 6, 2026),

https://www.unwomen.org/en/news-stories/feature-story/2026/08/how-aid-cuts-are-threatening-womens-organizations-responding-to-haitis-gang-violence ("There are some women who are raped and forced to be the wives of some of these gang leaders.").

[234] *See, e.g.,* BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, pp. 9, 17 (Aug. 25, 2026),

https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026; UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 10 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74; BINUH, *Quarterly Report on victhe Human Rights Situation in Haiti (January – March 2026)*, p. 15 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026; Dorly Castaneda & María Antonia Cote, *Sexual and gender-based violence as a tool of criminal governance in Haiti*, GI-TOC (Sep. 18, 2026), https://globalinitiative.net/analysis/sexual-and-gender-based-violence-as-a-tool-of-criminal-governance-in-haiti/ ("Women and girls are routinely abducted from their homes or from public transport, held for days or weeks, and raped repeatedly. Some gang members have even filmed assaults and circulated the footage to extort ransoms from families or to publicly humiliate the victims."); BINUH, *Flash Report - Intensification of Gang Violence in the Plaine du Cul-de-Sac Area and Cité Soleil (March - July 2026)*, pp. 14, 16 (Aug. 6, 2026), https://binuh.unmissions.org/en/document-library/flash-report-intensification-of-gang-violence-in-the-plaine-du-cul-de-sac-1; *see also* note 70.

[235] Local organizations working on human rights report that older persons now face increased vulnerability to GBV, with field data documenting an alarming surge in physical violence and collective rapes perpetrated against women between the ages of 50 and 80. (Notes on file with authors). *See also, e.g.*, CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, pp. 9-10 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (reporting that "nothing constrains [sexual violence] anymore," as evidenced by a sevenfold increase in attacks against those aged between 50 and 80 and targeting in spaces previousy immune from violence; and suggesting this indicates an "alarming. . . overall breakdown of the social fabric"); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, ¶ 75 (Sep. 8, 2026), https://docs.un.org/S/2026/714 (reporting that 16% of GBV cases reported to MSF involve minors, some as young as 8, 9, and 10); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, p. 17 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (noting that victims of sexual violence perpetrated by armed group members were as young as 10 and as old as 71); BINUH, *Quarterly Report on victhe Human Rights Situation in Haiti (January – March 2026)*, p. 15 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (documenting 57 victims of rape who were between 12 and 17 tears old); Jacqueline Charles, *Aid cuts forcing women's groups worldwide to close. In Haiti, they are feeling the toll*, Miami Herald (Jul. 10, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316461717.html (reporting the collective rape of a nine-year-old girl).

[236] *See, e.g.*, Global Protection Cluster, *Haiti Protection Analysis Update*, p. 9 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update ("[V]ictims were raped after being intercepted in the streets while carrying out their daily activities, or when perpetrators broke into their homes."); BINUH, *Flash Report - Intensification of Gang Violence in the Plaine du Cul-de-Sac Area and Cité Soleil (March - July 2026)*, pp. 14, 17-18 (Aug. 6, 2026), https://binuh.unmissions.org/en/document-library/flash-report-intensification-of-gang-violence-in-the-plaine-du-cul-de-sac-1 (describing victims being raped after assailants forcibly entered their homes, and intercepted in the streets while returning home, or whilst attempting to flee neighborhoods affected by clashes); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, p. 17 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting that of the 754 documented incidents of sexual violence perpetrated by armed group members between April and June 2026, 44% of rapes occurred in the victims' homes which armed group members forcibly entered, 40% were perpetrated while victims were walking in the street, and 5% occurred at IDP sites in the capital); Global Protection Cluster et al., *Haïti Snapshot sur les incidents de violences basees sur le genre (VBG) - De avril à juin 2026* (Jul. 27, 2026), https://reliefweb.int/report/haiti/haiti-snapshot-sur-les-incidents-de-violences-basees-sur-la-genre-vbg-de-avril-juin-2026 ("Incidents mainly occurred in the survivor's home (48%), on the road or in the street (10%), in the alleged perpetrator's home (8%), and in displacement camps and sites (2%)."); BINUH, *Quarterly Report on the Human Rights Situation*

in Haiti (January – March 2026), p. 15 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (reporting that of the 292 incidents of sexual violence perpetrated by armed group members between January and March 2026, 44% occurred while victims were moving through the streets, 38% took place in the victims' homes into which armed group members forcibly entered, and 5% occurred in IDP sites in the capital; and describing a 16-year-old girl apprehended and raped by several men while returning home after fetching water to bathe). Displacement, especially in host communities, has become a space of significant vulnerability. *See* notes 243-245. Gendered household responsibilities and reduced economic opportunities can also force women and girls into more dangerous spaces. *See* note 222; *see also* Global Protection Cluster, *Haiti Protection Analysis Update*, p. 10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update.

[237] *See, e.g.*, Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission on women's rights in Haiti (July 2026) by Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations to the UN Human Rights Council for Haiti's Universal Periodic Review*, ¶¶ 22-35 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf (reporting that "all forms of GBV remain widespread, even as attention and resources are focused mostly on conflict-related sexual violence" and providing an overview of femicide, family violence, SEA, gendered political violence, economic and psychological violence, and harassment directed against women and girls in Haiti) (citing sources and inputs from local organizations); CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, pp. 14-17, 20-21, 30-33 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (describing structural and psychological drivers of escalating GBV, including as a product of performing violent masculinities in response to stressors and high exposure to violence normalizing more violence; as well as GBV dynamics throughout the lifetimes of Haitian women and girls); Global Protection Cluster, *Haiti Protection Analysis Update*, pp. 9-10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (reporting that psychological violence and physical assault were the most common form of GBV reported between January and July 2026 after rape and that "[f]amilies are increasingly resorting to child and forced marriage as a perceived protective measure against armed violence"); UN General Assembly & Security Council, *Report of the Secretary-General on Children and armed conflict*, UN Doc. A/80/723-S/2026/357, ¶ 72 (Jun. 16, 2026), https://docs.un.org/en/A/80/723 (reporting on sexual violence perpetrated against children by police and civilian "defense" groups); Global Protection Cluster et al., *Haïti Snapshot sur les incidents de violences basees sur le genre (VBG) - De avril à juin 2026* (Jul. 27, 2026), https://reliefweb.int/report/haiti/haiti-snapshot-sur-les-incidents-de-violences-basees-sur-la-genre-vbg-de-avril-juin-2026 (reporting that in addition to sexual violence, recorded cases of GBV included "psychological and emotional violence (20%), physical assault (7%), and denial of resources, opportunities or services (3%)"); UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, p. 9 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf (reporting that domestic violence accounted for 32% of reported GBV in displacement sites, followed by verbal abuse at 17.42%); RNDDH, *Circulation de la vidéo d'un viol à Chambellan : Le RNDDH exige la poursuite des agresseurs et la protection de la mineure*, ¶¶ 1, 3-7, 9 (Mar. 13, 2026), https://web.rnddh.org/circulation-de-la-video-dun-viol-a-chambellan-le-rnddh-exige-la-poursuite-des-agresseurs-et-la-protection-de-la-mineure/?lang=en (reporting on the rape and harassment of an 8th grade girl that involved the threat and publication of a video of her assault).

Local organizations working on women's rights observe that GBV is perpetrated by state authorities like police and prison staff, by community and religious leaders, by humanitarian workers, by employers and co-workers, and by family members and intimate partners. Widespread SEA is noted across all aspects of public life for women, including education and employment. One organization reported SEA incidents where women were transported to the Dominican Republic to provide sexual services. (Notes on file with authors). *See also, e.g.*, Haiti Libre, *A haitian police officer implicated in a case of rape of a 14-year-old minor* (Jun. 5, 2026), https://www.haitilibre.com/en/news-47681-a-haitian-police-officer-implicated-in-a-case-of-rape-of-a-14-year-old-minor.html (reporting on the formal investigation of a police officer for a sexual assault against a minor); Rhinews, *Harcèlement sexuel présumé au CNAL : un rapport de l'OPC illustre des comportements inappropriés et de graves failles institutionnelles…* (Jul. 2, 2026), https://www.rhinews.com/actualites/harcelement-sexuel-presume-au-cnal-un-rapport-de-lopc-illustre-des-comportements-inappropries-et-de-graves-failles-institutionnelles/ (describing an investigation into allegations of sexual harassment and abuse of authority by the CNAL Technical Director against a junior female employee of the CNAL, the state institution responsible for providing legal aid). There has been no accountability for the four cases of rape reported against MSS troops and corroborated by the OHCHR, and the government of Kenya continues to deny they are sufficiently supported by evidence. The UN Panel of Experts reports there were additional cases of SEA perpetrated by members of the MSS, some of which included sexual transactions in exchange for money or food. The panel further finds that GSF deployments into vulnerable areas have "fallen short of providing the necessary safeguards to prevent [SEA]." UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, ¶¶ 78-81 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714.

In April 2026, information became public that the OHCHR had substantiated allegations of SEA committed by Kenyan MSS personnel against four girls, aged 12, 16, 16, and 18. UN Secretary General, *Special measures for protection from sexual exploitation and abuse (A/80/644)*, ¶ 72 (Feb. 16, 2026), https://docs.un.org/en/a/80/644; UN Secretary General, *Supplementary information to the report of the Secretary-General on special measures for protection from sexual exploitation and abuse (A/80/644)*, p. 43 (Feb. 16, 2026), https://www.un.org/preventing-sexual-exploitation-and-abuse/sites/www.un.org.preventing-sexual-exploitation-and-abuse/files/smr_2026_a-80-644_supplementary_data.pdf (providing additional details); *see also* Jérôme Wendy Norestyl & Wethzer Piercin, *The Kenyan mission implicated in 4 cases of sexual abuse and exploitation in Haïti*, Ayibo Post (Apr. 2, 2026), https://backoffice.ayibopost.com/clash-between-the-kenyans-and-the-united-nations-over-sexual-abuse-cases-in-haiti/. To date, there has been no accountability for the four survivors, and the government of Kenya continues to deny that the allegations are sufficiently supported by evidence. The UN Panel of Experts documents that local organizations reported additional cases of SEA perpetrated by members of the MSS, some of which involved transactions in exchange for money or food. Other reporting indicates there may be at least ten SEA cases, with one victim who is just ten years old. Jérôme Wendy Norestyl, *Clash between the Kenyans and the United Nations over sexual abuse cases in Haiti*, AyiboPost (Apr. 26, 2026), https://backoffice.ayibopost.com/clash-between-the-kenyans-and-the-united-nations-over-sexual-abuse-cases-in-haiti/ (describing

skepticism of formal MSS inquiries and contextual constraints to formal reporting); *see also* RCI Web avec Florence Treuil, *Haïti : des members de la MMAS visés par des accusations d'agressions sexuelles*, RCI (Apr. 7, 2026), https://rci.fm/deuxiles/infos/Caraibes/Haiti-des-membres-de-la-MMAS-vises-par-des-accusations-dagressions-sexuelles (reporting that there may be more than the four cases, including allegations by a member of the MSS steering committee in charge of human rights compliance that Kenyan officers tookd part in "a prostitution program involving minors"). The UN Panel of Experts concludes that deployments into vulnerable areas have "fallen short of providing the necessary safeguards to prevent [SEA]." UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, ¶¶ 78-81 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714. According to a source, as of at least mid-September, none of the survivors have received compensation or support from the MSS, UN, or other implicated actors, even as one of the raped girls became pregnant as a consequence and at least one was forced to relocate due to resulting community stigma. *See also* Jérôme Wendy Norestyl, *Clash between the Kenyans and the United Nations over sexual abuse cases in Haiti*, AyiboPost (Apr. 26, 2026), https://backoffice.ayibopost.com/clash-between-the-kenyans-and-the-united-nations-over-sexual-abuse-cases-in-haiti/ (reporting that as of late April, the ten-year-old survivor had received no compensation or assistance and had ben moved to another location due to concerns over potential harm); Juhakenson Blaise, *Rights advocates in Haiti urge justice after UN confirms 4 Kenya-led mission sexual abuse cases*, Haitian Times (Apr. 8, 2026), https://haitiantimes.com/2026/04/08/rights-advocates-in-haiti-urge-justice-after-un-confirms-4-kenya-led-mission-sexual-abuse-cases/ (reporting an unconfirmed allegation that a 17-year-old survivor was impregnated by a Kenyan officer who subsequently died in an operation, leaving the girl and her child without support). The all-male deployment critiqued by the UN Panel of Experts was co-located with the PNH, who were also credibly accused of rape, according to the source. Other reporting indicates police may have facilitated the abuses, including where they involved minors. Jérôme Wendy Norestyl, *Clash between the Kenyans and the United Nations over sexual abuse cases in Haiti*, AyiboPost (Apr. 26, 2026), https://backoffice.ayibopost.com/clash-between-the-kenyans-and-the-united-nations-over-sexual-abuse-cases-in-haiti/. It is not clear whether the GSF is participating or will participate in similar deployments, but this history, the inadequate response, and the lack of safeguards noted by the UN Panel of Experts raise serious concerns about the possibility of ongoing or future abuses in the context of foreign deployments in Haiti. There has been no public announcement of any Haitian judicial inquiry into these abuses. *Id. See further* notes 444-448 and associated text.

[238] Local organizations working with survivors of GBV emphasize the long-term harms arising from sexual violence, including forced pregnancies or dangerous abortions; STIs and other lasting gynecological and physical impairments; long-term psychological and emotional trauma and challenges; deep and destructive stigmatization by survivors' communities; loss of education; and the economic losses and burdens of seeking responsive care and accountability or forced parenthood and child-rearing. (Notes on file with authors). *See also, e.g.*, Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission to the United Nations Human Rights Council Universal Periodic Review Re Women's Rights in Haiti*, ¶¶ 24, 45 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf ("Accompanying (i) physical and psychological trauma like deep injuries, STIs, and post-traumatic stress disorder; (ii) associated costs of treatment and recovery; and (iii) pregnancies and children resulting from rape violently compound the harms. Deep social stigma and shame, which can manifest as 'social death' and lead to suicide, add another dimension. The impacts are both immediate and generational, as these impediments both disproportionately put women and girls into a more precarious humanitarian situation, and curtail their long-term wellbeing and socioeconomic mobility, resulting in deepened intergenerational poverty and vulnerability.") (internal citations omitted); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (January – March 2026)*, p. 15 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 ("Beyond the immediate trauma, the long-term consequences of this sexual violence are devastating and often result in psychological, economic and social impacts."); Global Protection Cluster, *Haiti Protection Analysis Update*, pp. 9-10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update ("Reports also indicate increased substance abuse as a coping mechanism among survivors seeking to deal with trauma and distress."); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, pp. 17-18 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (describing a woman who had committed suicide after being unable to overcome the psychological consequences of the sexual violence she had suffered, and a woman who had contracted HIV after being raped by multiple masked men); Jacqueline Charles, *Aid cuts forcing women's groups worldwide to close. In Haiti, they are feeling the toll*, Miami Herald (Jul. 10, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316461717.html (describing a nine-year-old girl who was unable to speak, feed herself, or walk without a wheelchair after being raped); RNDDH, *Circulation de la vidéo d'un viol à Chambellan : Le RNDDH exige la poursuite des agresseurs et la protection de la mineure*, ¶¶ 1, 3-7, 9 (Mar. 13, 2026), https://web.rnddh.org/circulation-de-la-video-dun-viol-a-chambellan-le-rnddh-exige-la-poursuite-des-agresseurs-et-la-protection-de-la-mineure/?lang=en (describing an example where a young girl was stigmatized, shunned, and expelled from school after she was raped and harassed, with a video published of her assault).

[239] Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission on women's rights in Haiti (July 2026) by Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations to the UN Human Rights Council for Haiti's Universal Periodic Review*, ¶ 45 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf ("Abortion remains illegal, prohibitively expensive, and largely inaccessible even as the number of unwanted pregnancies arising from rape has increased, including for very young girls.") (citing sources); C-Fam Staff, *Submission to the 54th session of the Human Rights Council's Universal Periodic Review Working Group of Haiti – January-February 2027*, Center for Family & Human Rights, ¶ 7 (Jul. 18, 2026), https://c-fam.org/un_statement/submission-to-the-54th-session-of-the-human-rights-councils-universal-periodic-review-working-group-of-haiti-january-february-2027/ (describing abortion as highly stigmatized and still illegal with very limited exceptions, even as a proposed partial decriminalization "has been delayed due to both political instability and opposition from proponents of traditional family values"); Amnesty International, *Fighting for the right to exist* (Mar. 12, 2026), https://www.amnesty.org/en/latest/campaigns/2026/03/luchar-por-el-derecho-a-existir-entrevista-con-pascale-solages-feminista-y-activista-haitiana/ ("[U]nsafe abortion is one of the leading causes of maternal mortality in Haiti, particularly among girls who become pregnant after rape."). The Haitian women's rights organization *Organisation des Femmes*

Solidaires (OFASO) describes multiple barriers to accessing abortion, including: insecurity; economic constraints like the cost of medical consultations, medications, transportation, and lodging; social stigma and fear of judgment or rejection by family and community; a lack of safe and qualified services, their continued criminalization, and the dearth of reliable information about availability; and the psychological consequences of rape. (Notes on file with authors).

[240] Local organizations working on women's rights emphasize the harm of "forced pregnancies" resulting from the weaponization of sexual violence and lack of timely access to emergency contraception or safe abortion. They note in particular social stigma, rejection, and isolation, especially for girls, in addition to other long-term consequences associated with giving birth to a child as a result of rape. For girls, such pregnancies can also mean expulsion from school and loss of education. (Notes on file with authors). *See also, e.g.*, Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission on women's rights in Haiti (July 2026) by Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations to the UN Human Rights Council for Haiti's Universal Periodic Review*, ¶¶ 24, 45, 48 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf; Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("Many young girls become pregnant after being raped; despite efforts to change it, abortion is not legal in Haiti, leaving children to raise children.").

[241] *See, e.g.*, Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission on women's rights in Haiti (July 2026) by Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations to the UN Human Rights Council for Haiti's Universal Periodic Review*, ¶¶ 16, 24, 29, 31-32, 35, 48 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf (detailing the adverse impact of GBV on the ability of women and girls "to obtain critical supplies, reach necessary services, and pursue independent livelihoods" and education, in addition to impeding their ability to engage in advocacy and political activities); CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, p. 12 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 ("[T]he normalization of violence against women has affected multiple aspects of women's participation in civic and social life and more tragically, their propensity to report SGBV and seek justice."); Dorly Castaneda & María Antonia Cote, *Sexual and gender-based violence as a tool of criminal governance in Haiti*, GI-TOC (Sep. 18, 2026), https://globalinitiative.net/analysis/sexual-and-gender-based-violence-as-a-tool-of-criminal-governance-in-haiti/ ("A woman crossing a series of gang-controlled checkpoints in a single day, whether to sell goods, reach a market or visit a clinic, is forced to navigate overlapping systems of coercion where SGBV is constant risk."); Marie Goretti Nduwayo, *Haiti opens first state-supported safe houses for women and girls, as gangs continue to weaponize sexual violence*, UN Women (Jun. 12, 2026), https://www.unwomen.org/en/news-stories/press-briefing/2026/06/haiti-opens-first-state-supported-safe-houses-for-women-and-girls-as-gangs-continue-to-weaponize-sexual-violence ("Today, extortion at illegal checkpoints on gang-controlled roads, repetitive kidnappings and sexual violence have left women and girls fearing for their safety and leaving them unable to even take part in daily life."); *see also* UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, p. 9 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf ("Repeated exposure to violence contributes to ongoing psychological distress, which compounds other vulnerabilities and limits people's capacity to access services or pursue livelihoods."). OFASO shared its assessment that the risk of GBV, among other factors, serves as a barrier to displaced women's effective participation in coordination mechanisms, management committees, and decisions regarding humanitarian assistance. (Notes on file with authors). The added barriers to independent livelihoods, in turn, exacerbate gendered dependencies and vulnerability to abuse and exploitation, while increasing pressures toward transactional or survival sex. *See* notes 243, 245.

[242] IOM, *Haiti – Report on the internal displacement situation – Round 14 (August 2026)*, p. 8 (Sep. 23, 2026), https://dtm.iom.int/reports/haiti-report-internal-displacement-situation-round-14-august-2026?close=true (reporting women and girls as 55% of the displaced population as of mid-August 2026); IOM, *Haiti – Update on the displacement situation in spontaneous sites (June 2026)*, pp. 1, 3 (Jul. 12, 2026), https://dtm.iom.int/reports/haiti-update-displacement-situation-spontaneous-sites-june-2026?close=true (reporting that women were 54% and children 34% of IDPs in five displacement sites between May and June 2026).

[243] *See, e.g.*, Global Protection Cluster, *Haiti Protection Analysis Update*, pp. 8-10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (reporting risks both at IDP sites, where "poor infrastructure, including inadequate lighting, insecure sanitation facilities, and distant water points, creates conditions that facilitate sexual violence and exploitation;" and in host communities, where "[o]vercrowded living conditions, economic dependence, extortion, and social exclusion increase exposure to abuse, particularly for women and adolescent girls"); UNFPA, *Situation Report: Haiti: Displacement from escalation in gang violence 1 July - 31 August 2026* (Sep. 2026), https://www.unfpa.org/sites/default/files/resource-pdf/Situation%20Report_Haiti_Jul-Aug%202026.pdf ("Women and girls . . . face heightened risks of sexual violence in displacement sites, partly due to the poor living conditions and lack of adequate protection and services."); UN Women (Jun. 12, 2026), https://www.unwomen.org/en/news-stories/press-briefing/2026/06/haiti-opens-first-state-supported-safe-houses-for-women-and-girls-as-gangs-continue-to-weaponize-sexual-violence ("Most displacement sites do not have adequate lighting. Most do not have functioning locks in bathrooms or separate facilities for women and men. These conditions put women and girls at further risk of violence."); UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, p. 9 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf (detailing findings from 22 displacement sites including (i) "[p]hysical infrastructure gaps" like inadequate lighting and lack of functioning locks on doors of sanitation facilities; (ii) protection services that are extremely limited relative to need; (iii) lack of dedicated psychosocial support at any of the sites; (iv) "largely unavailable" legal services; (v) dearth of designated spaces for GBV survivors; (vi) collapse of livelihoods; and (vii) absence of complaint or feedback mechanisms (at 60% of sites)); Mac Archer, *Displacement, Gendered Harm, and the Normalization of Crisis in Port-au-Prince, Haiti*, Mercy Corps, pp. 3-9 (Mar. 24, 2026), https://www.prosperglobal.org/sites/default/files/2026-03/crisis-analysis_displacement-gendered-harm-and-the-normalization-of-

crisis-in-port-au-prince.pdf (reporting based on research across five IDP sites in Port-au-Prince that "life inside IDP sites is defined less by access to temporary shelter and more by ongoing exposure to violence, high rates of gender-based violence (GBV), near-total livelihood collapse, and extreme food insecurity, all compounded by weak reporting mechanisms and inadequate protective infrastructure" and providing details); IOM, *Haiti's Displacement Crisis Hit Record 1.5 Million Amid Escalating Violence* (Jun. 5, 2026), https://www.iom.int/news/haitis-displacement-crisis-hits-record-15-million-amid-escalating-violence (reporting "critical shortages of shelter, food, clean water, healthcare and psychosocial support" as well as "[o]vercrowded living conditions and limited access to services [and protections as] increasing protection risks, including exploitation and abuse," and identifying pregnant women, and female-headed households among the most vulnerable); Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("Women and girls in IDP camps lack access to menstrual hygiene support, increasing their risk of urinary and reproductive tract infections."); POHDH, *BILAN SEMESTRIEL 2026: Crise de gouvernance renforcée et détérioration des conditions socioéconomiques, la POHDH dresse le bilan des six premiers mois de l'année 2026*, pp. 12, 28 (Jul. 30, 2026), https://pohdh-ht.org/media/documents/BILAN_SEMESTRIEL_POHDH_juillet_2026.pdf (reporting that in the absence of effective protective measures, educational and economic opportunities, and key services, displaced women and girls are exposed to disease and violence, which is also driving an increase in adolescent pregnancies); UN, *Panel of Experts Report to the UN Security Council*, UN Doc. S/2026/241, ¶ 32 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 (noting that internally displaced women lack specialized healthcare, particularly routine gynecological services). According to Haitian women's rights organization RÈG Ayiti, obstacles to reporting GBV at discplacement sites include (i) the lack or inaccessibility of complaint boxes or hotlines; (ii) discouragement of reporting by responsible authorities. As in other contexts, these gaps increased vulnerability to exploitation and harmful coping strategies like survival sex. *See, e.g.*, UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, pp. 3, 9 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf; Mac Archer, *Displacement, Gendered Harm, and the Normalization of Crisis in Port-au-Prince, Haiti*, Mercy Corps, p. 9 (Mar. 24, 2026), https://www.prosperglobal.org/sites/default/files/2026-03/crisis-analysis_displacement-gendered-harm-and-the-normalization-of-crisis-in-port-au-prince.pdf (finding that 99.1% of respondents at five IDP locations "report[ed that] no income and near-universal meal reduction, livelihood collapse and hunger are primary drivers of coercion and harmful coping mechanisms" and summarizing that "baseline data provides operationally relevant insight into how harm is produced within displacement settings (e.g. due to scarcity, coercion, lack of privacy, weak accountability)"); *see* note 252.

Protection failures at IDP sites also reflect and are exacerbated by women's marginalization in site management, although some meaningful steps towards equalizing participation have been made due to sustained advocacy. UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, p. 12 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf (describing "meaningful progress" in women's representation in IDP site management, although structural barriers persist and women are commonly relegated to secondary roles, discounted, or express discomfort with the conduct of certain male managers). Leadership opportunities for individuals with intersecting vulnerabilities like disabilities are especially limited or nonexistent. *Id.* at pp. 12 & 13. Local organizations working on women's rights indicate that displaced women's effective participation in coordination mechanisms, management committees, and decisions regarding humanitarian assistance remains a significant challenge, pointing to a variety of barriers, including continued under-representation or marginalization in decision-making bodies (for example limited influence over actual decisions), information gaps about community meetings, competing family responsibilities, and the risk of GBV. They observe that since January 2026, women have been represented in management committees at the Indigène, Kay Félix, Gloria, and Manjwa displacement sites, as well as within the Haitian Civil Protection Agency (**DPC**). In their experience, women's increased participation has made it easier to support survivors of GBV, as women in management roles are more aware of related issues, more approachable to survivors (improving reporting), and easier for women's organizations to work with. (Notes on file with authors).

[244] *See, e.g.*, Global Protection Cluster, *Haiti Protection Analysis Update*, pp. 9-10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update ("Displacement continues to be a major driver and aggravating factor of GBV risk. Internally displaced persons living in host communities constitute the largest group of survivors."); Global Protection Cluster et al., *Haïti Snapshot sur les incidents de violences basees sur le genre (VBG) - De avril à juin 2026* (Jul. 27, 2026), https://reliefweb.int/report/haiti/haiti-snapshot-sur-les-incidents-de-violences-basees-sur-la-genre-vbg-de-avril-juin-2026 (reporting that displaced individuals were 56% of sexual violence survivors between April and June); *see also* UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, pp. 9 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf (reporting based on large-scale survey across 22 displacement sites and 15 communes that GBV was widely documented at every site). Under-reporting means the true incidence is far higher. *See, e.g.*, Mac Archer, *Displacement, Gendered Harm, and the Normalization of Crisis in Port-au-Prince, Haiti*, Mercy Corps, pp. 5, 7 (Mar. 24, 2026), https://www.prosperglobal.org/sites/default/files/2026-03/crisis-analysis_displacement-gendered-harm-and-the-normalization-of-crisis-in-port-au-prince.pdf (reporting research findings that "GBV is frequently underreported in Haiti due to stigma, fear of retaliation, and weak accountability" as well as "a total absence of mechanisms for reporting" at IDP sites, and that non-reporting of physical or sexual violence "is itself a survival strategy: women described a fear of retaliation, pervasive shame, and lack of confidence that any reporting mechanism would provide genuine protection"); *see also* note 229.

[245] Local advocates working on women's rights share that displaced women and girls are being forced into sexual relations in exchange for food, shelter, protection, and financial support – sometimes by humanitarian workers, who are generally Haitian employees or agents of international organizations – who ask them for sexual favors in exchange for assistance. Such cases often go unreported because the women are in situations of heightened economic vulnerability and fear losing their place at the displacement site or access to services, or because they experience the relationship as a "romantic" one notwithstanding the underlying abuse of power. (Notes on file with authors). *See also, e.g.*, Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission on women's rights in Haiti (July 2026) by Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations to the UN Human Rights Council for Haiti's Universal Periodic Review*, ¶ 29 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-

Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf ("Women and girls in displacement situations report being forced to trade sex for basic necessities like tents and food by camp managers."); Mac Archer, *Displacement, Gendered Harm, and the Normalization of Crisis in Port-au-Prince, Haiti*, Mercy Corps, pp. 6-8 (Mar. 24, 2026), https://www.prosperglobal.org/sites/default/files/2026-03/crisis-analysis_displacement-gendered-harm-and-the-normalization-of-crisis-in-port-au-prince.pdf (reporting that women surveyed at five IDP sites "described situations in which a refusal to meet sexual demands can lead to exclusion, isolation, or loss of access to assistance pathways," and observing that "scarcity reshapes consent and power," such that "in a context of a continual hunger and economic disempowerment, 'small things' become leverage and exploitative arrangements are normalized").

[246] Local partners share that access to support services for survivors of GBV is particularly difficult in areas controlled by armed groups and in isolated rural communities. (Notes on file with authors). *See also, e.g.*, UNICEF, *Haiti Humanitarian Situation Report No. 1, 31 March 2026*, p. 4 (May 5, 2026), https://www.unicef.org/media/180471/file/Haiti-Humanitarian-Situation-Report-No.1,31-March-2026.pdf.pdf ("GBV services remain insufficient compared to the scale of the needs, particularly in displacement sites and violence-affected urban areas."); UNFPA, *Situation Report: Haiti: Displacement from escalation in gang violence 1 July - 31 August 2026* (Sep. 2026), https://www.unfpa.org/sites/default/files/resource-pdf/Situation%20Report_Haiti_Jul-Aug%202026.pdf ("Humanitarian access also remains a challenge and is impacting service provision [to survivors of sexual violence] in areas where there are risks of attacks and abductions of humanitarian workers."); *id.* (reporting that following large-scale August attack in Kenscoff, "[c]ase management, structured referrals, GBV response services, and legal assistance are not currently provided by any organization" operating in the neighborhood, "leaving survivors of sexual violence without access to essential support services").

[247] *See, e.g.*, UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, pp. 4, 10-11 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf (reporting that "[t]he crisis has significantly affected livelihoods across affected populations, with the most severe impact concentrated among women," with resulting "widening gap between economic capacity and household responsibility," and disproportionately reduced access to healthcare, education, water, sanitation, and food); Doctors Without Borders, *Women risk their lives to access sexual and reproductive health care in Haiti* (Aug. 19, 2026), https://www.doctorswithoutborders.org/latest/women-risk-their-lives-access-sexual-and-reproductive-health-care-haiti (reporting that many health facilities in Port-au-Prince has been forced to close, thus severely reducing access to essential health care – especially for women and their sexual and reproductive health care"); Global Protection Cluster, *Haiti Protection Analysis Update*, p. 10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update ("Women heading households are frequently forced to undertake informal economic activities in areas controlled by armed groups despite the high risk of sexual violence"); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, p. 18 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting that local service providers supporting survivors of sexual violence, including through medical, psychological, and legal assistance are limited in their capacity to meet the needs of all victims due to funding and personnel shortages); UNICEF, *Haiti Humanitarian Situation Report No. 2 (Mid- Year), 30 June 2026*, p. 5 (Aug. 11, 2026), https://www.unicef.org/documents/haiti-humanitarian-situation-report-no-2-mid-year-30-june-2026 (stating that critical gaps remain in the provision of mental health and psychosocial support and GBV response services, driven by severe underfunding among other factors). According to the Global Protection Cluster, "shelters, legal assistance, livelihood opportunities and longer-term recovery support" are especially scarce in terms of services available for GBV survivors. Global Protection Cluster, *Haiti Protection Analysis Update*, p. 10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update. Mr. Jean-Gérard Clervil, a psychologist with PROFAMIL shared that women and children are particularly affected by the scarcity and expense of mental health support, which has been worsened by closures of specialized centers. *See also* notes 352-356.

[248] For example, among the women's organizations surveyed by UN Women in Haiti, 83% reported losing staff, two-thirds said they were forced to delay or suspend services for survivors of GBV, and 97% reported "their capacity to provide services is lower than the current need, [with] 1 in 3 expect[ing] to suspend operations or close entirely within the next 12 months" following aid cuts. UN Women, *How aid cuts are threatening women's organizations responding to Haiti's gang violence* (Aug. 6, 2026),

https://www.unwomen.org/en/news-stories/feature-story/2026/08/how-aid-cuts-are-threatening-womens-organizations-responding-to-haitis-gang-violence. *See also, e.g.*, Global Protection Cluster, *Haiti Protection Analysis Update*, p. 9 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (reporting that "the erosion of state protection mechanisms increased exposure to violence and reduced access to protection and assistance;" that "[f]unding for protection activities remains low in 2026, with the Protection Chapter of the Humanitarian Needs and Response

Plan (HNRP) funded at approximately 26 per cent, significantly limiting the ability of protection actors to meet escalating needs

across Haiti;" that "[l]imited donor contributions continue to affect the availability of essential protection services, including case

management, coordination, psychosocial support, legal assistance, protection monitoring, and specialized interventions for

women and girls, children, persons with disabilities, older persons, and LGBTIQ+ individuals;" and that "[c]onsultations with Protection Cluster partners have highlighted a growing gap between protection needs and available response capacity"); UN Women, *Beyond the breaking point: The continuing impact of funding cuts on women's organizations in humanitarian setting*, p. 27 (Jul. 10, 2026), https://www.unwomen.org/sites/default/files/2026-07/beyond-the-breaking-point-the-continuing-impact-of-funding-cuts-on-womens-organizations-in-humanitarian-settings-en.pdf (reporting on global impacts with specific examples from Haiti); Jacqueline Charles, *Aid cuts forcing women's groups worldwide to close. In Haiti, they are feeling the toll*, Miami Herald (Jul. 10, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316461717.html (reporting on specific example of negative impact); UN, *Youri Saadallah (Norwegian Refugee Council) and Maria Moita (IOM) on the humanitarian situation in Haiti - Press Release* (Jul. 10, 2026), https://media.un.org/avlibrary/en/asset/d360/d3605958 (noting that women-led organizations are being overwhelmed by the scale of the trauma and suffering in Haiti). In general, local advocates observe the lack of political will and budgeting to prevent or address GBV – especially in its manifestations beyond sexual violence perpetrated by armed groupsl and a retrenchment on women's rights. As an example, Pascale Solages, general coordinator of

Haitian feminist organization Nègès Mawon, shared that they were forced to close a GBV shelter program called Maison Claire Heureuse, which had been effectively operating for two years, because the funding had been reallocated away from GBV towards other priorities, like environmental and climate rights. (Notes on file with authors). *See also* CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, pp. 32- (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (describing historical government failures to prioritize GBV, as enabled by foreign interventionalist practices). Further illustrating the lack of focus on women's rights, the role of Senior Women's Protection Adviser at BINUH has been vacant since April 2026. *See further* IJDH, *Human Rights Update – March 2026*, p. 13 (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf. The continuing vacancy is especially troubling given the lack of accountability and meaningful policy and protection response following the allegations of SEA by members of the MSS that emerged around the same time. *See* notes 237, 444.

[249] Haitian women's organizations play the "frontline humanitarian and protection" role in the crisis, even as they face significant security risks, threats of reprisals from armed groups, and funding gaps. UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, pp. 12-13 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf. Notwithstanding their keystone role, these organizations report "limited formal recognition as humanitarian actors," unequal and exclusionary relationships with international partners, and limited opportunities to co-design responses. *Id.* Local organizations working on women's rights affirm that local feminist and women's organizations are generally the ones that provide assistance to survivors of GBV, even as they face budget constraints. (Notes on file with authors). *See generally* CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, pp. 20-21, 35-37 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (describing dynamics around women in haiti as "the primary infrastructure of response").

[250] According to UN and Global Protection Cluster reports, five or "six platforms on sexual and gender-based violence (**SGBV**), also involving service providers, were organized in six police stations in the Port-au-Prince metropolitan area and the Artibonite department;" and police officers, prosecutors, and judges received training in specialized and survivor-centered proceedings. Global Protection Cluster, *Haiti Protection Analysis Update*, p. 13 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update; BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, pp. 20, 22 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026. For the first time, the government also opened two of four promised shelters for GBV survivors intended to offer comprehensive services. https://lac.unwomen.org/en/stories/noticia/2026/07/haiti-inaugura-una-segunda-casa-de-las-mujeres-para-sobrevivientes-de-violencia (reporting on the opening of a "Women's House" in the West Department in May and in Grand'Anse in July, with two more promised in Artibonite and Center Departments); *see also* Marie Goretti Nduwayo, *Haiti opens first state-supported safe houses for women and girls, as gangs continue to weaponize sexual violence*, UN Women (Jun. 12, 2026), https://www.unwomen.org/en/news-stories/press-briefing/2026/06/haiti-opens-first-state-supported-safe-houses-for-women-and-girls-as-gangs-continue-to-weaponize-sexual-violence (emphasizing the scale of need and insufficiency of services in connection with openings).

The opening of the first shelters with government involvement may be a positive development, although its seeming dependence on funding from UN Women and the government of Japan raises questions of sustainability, *see* Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission to the United Nations Human Rights Council Universal Periodic Review Re Women's Rights in Haiti*, ¶ 21 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf, especially in the context of simultaneous closures of existing successfully-run shelters, *cf.* note 248. unprecedented nature also underscores the government's usual shortcomings in securing women's rights. Multiple women's rights organizations working in Haiti affirm that the government is consistently largely absent from providing services to GBV survivors and that the institutions mandated to engage with survivors are few and lack adequate capacity and resources. Local advocates and lawyers working with survivors of GBV shared that even with recent efforts to strengthen specialized capacity to respond to GBV, the government generally remains unable to respond to survivor needs in many jurisdictions, including especially at displacement sites, in areas controlled by armed groups, and in rural communities. They specifically noted that the Police Brigade for the Protection of Minors (**BPM**) lacks adequate operational resources and struggles to reach insecure areas. While they do think that the new PNH platforms facilitate certain reports and referrals, they have observed relatively few cases result in actual prosecutions. One way to observe the government's weak presence in this space are the much lower rates of reporting documented by its entities versus by organizations. (Notes on file with authors). *See also, e.g.*, note 256 (providing examples of reporting discrepancies); Global Protection Cluster, *Haiti Protection Analysis Update*, p. 11 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (assessing that the BPM lacks sufficient financial and human resources and must be strengthened). One government initiative, to renovate and modernize the specialized Sexual Crimes Unit (**ULCS**) within the PNH, including by improving its investigative capabilities (*see* Likenton Joseph, *170 victimes de viol collectif entre mars et juin 2026 : la PNH annonce la rénovation et la relance de l'Unité de lutte contre les crimes sexuels*, Le National (Jun. 26, 2026), https://www.lenational.org/article/politique/8086/170-victimes-de-viol-collectif-entre-mars-et-juin-2026-la-pnh-annonce-la-renovation-et-la-relance-de-lunite-de-lutte-contre-les-crimes-sexuels), is responsive to previous civil society critiques about its reduced function. *See, e.g.*, Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission to the United Nations Human Rights Council Universal Periodic Review Re Women's Rights in Haiti*, ¶ 21 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf (describing government "failure to prioritize and budget for women's rights," including present weakness of specialized units for addressing GBV like the BPM and the ULCS). The effectiveness of the effort remains to be seen at the time of writing, but Rosy Auguste Ducéna expressed skepticism about the potential impact of the improvements since the ULCS is barely present in most parts of the country and likely to remain insufficient relative to need in Port-au-Prince and other major cities. *See also id*. It is also critical that any demobilization, reintegration, and transitional justice efforts take into account all forms of GBV to avoid further entrenching injustice. Dorly

Castaneda & María Antonia Cote, *Sexual and gender-based violence as a tool of criminal governance in Haiti*, GI-TOC (Sep. 18, 2026), https://globalinitiative.net/analysis/sexual-and-gender-based-violence-as-a-tool-of-criminal-governance-in-haiti/ (setting out imperative based on experience of Colombia's civil war).

[251] *See, e.g.*, UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, p. 4 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf ("Women and girls face increased barriers to accessing essential services, including healthcare, . . . due to infrastructure disruptions, economic constraints, and care responsibilities that limit mobility."); UNFPA, *Women and girls must enjoy their rights and fair justice in Haiti* (Mar. 11, 2026), https://haiti.unfpa.org/en/news/women-and-girls-must-enjoy-their-rights-and-fair-justice-haiti (describing "[l]egal fees, transportation costs, family responsibilities, and loss of income [as] significant barriers to accessing justice"); Global Protection Cluster, *Haiti Protection Analysis Update*, p. 10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (reporting that access to timely and effective services for GBV survivors is constrained by multiple obstacles, including lack of essential medical supplies, "insecurity among transportation routes, movement restrictions imposed by armed groups, high transportation costs, fear of retaliation, and interruptions to referral pathways;" and that "[s]ervice provision remains uneven, with comparatively greater access to medical services and psychosocial support than to shelters, legal assistance, livelihood opportunities and longer-term recovery support"); UNFPA, *Situation Report: Haiti: Displacement from escalation in gang violence 1 July - 31 August 2026* (Sep. 2026), https://www.unfpa.org/sites/default/files/resource-pdf/Situation%20Report_Haiti_Jul-Aug%202026.pdf (reporting that following the Kenscoff attack on August 23, 2026, "[c]ase management, structured referrals, GBV response services, and legal assistance are not currently provided by any organization operating in Kenscoff, leaving survivors of sexual violence without access to essential support services"); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, p. 18 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (noting that the provision of services to support survivors of GBV is limited by "difficulties in relocating victims exposed to risks of reprisals, particularly due to the insufficient number of shelters in safe areas"); UNICEF, *Haiti Humanitarian Situation Report No. 2 (Mid- Year), 30 June 2026*, p. 5 (Aug. 11, 2026), https://www.unicef.org/documents/haiti-humanitarian-situation-report-no-2-mid-year-30-june-2026 (stating that critical gaps remain in the provision of services to survivors of GBV, driven by insecurity and access constraints among other factors); Global Protection Cluster et al., *Haïti Snapshot sur les incidents de violences basees sur le genre (VBG) - De avril à juin 2026* (Jul. 27, 2026), https://reliefweb.int/report/haiti/haiti-snapshot-sur-les-incidents-de-violences-basees-sur-la-genre-vbg-de-avril-juin-2026 (assessing that "insecurity and access constraints also break the continuity of the referral pathway and undermine survivors' protection and dignity across the country," with only 15% of survivors among all reported cases for April to June 2026 receiving medical care and just 6% receiving psychosocial support); Marie Goretti Nduwayo, *Haiti opens first state-supported safe houses for women and girls, as gangs continue to weaponize sexual violence*, UN Women (Jun. 12, 2026), https://www.unwomen.org/en/news-stories/press-briefing/2026/06/haiti-opens-first-state-supported-safe-houses-for-women-and-girls-as-gangs-continue-to-weaponize-sexual-violence ("[D]edicated services for survivors are extremely limited, including psychosocial and legal support, which remain largely unavailable.").

[252] Local organizations working on women's rights describe observing women and girls being forced into sexual encounters in exchange for food, shelter, protection, employment, and financial support. They highlight that women's economic precarity leaves them more vulnerable to sexual exploitation. (Notes on file with authors). *See also, e.g.*, Global Protection Cluster, *Haiti Protection Analysis Update*, p. 10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update ("As displacement, insecurity and economic hardship deepen, affected populations increasingly resort to harmful coping mechanisms. Transactional and survival sex have become common strategies for women and adolescent girls seeking food, shelter, income or protection. These practices increase exposure to HIV and other sexually transmitted infections, unwanted pregnancies, further exploitation."); Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission to the United Nations Human Rights Council Universal Periodic Review Re Women's Rights in Haiti*, ¶¶ 14, 29 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf; notes 237, 245.

[253] Local organizations working on women's rights describe shortages of contraception, insecurity, and related difficulties in traveling to health facilities as increasing risks of unwanted pregnancies and obstetric complications. One noted especially restricted access in the zone du Bicentenaire, where virtually all health centers have closed. (Notes on file with authors). *See also, e.g.*, Doctors Without Borders, *Women risk their lives to access sexual and reproductive health care in Haiti* (Aug. 19, 2026), https://www.doctorswithoutborders.org/latest/women-risk-their-lives-access-sexual-and-reproductive-health-care-haiti (describing acute and sometimes deadly harms arising from "increasingly limited" access to sexual and reproductive health care, including "eclampsia, hemorrhages, infections, [and] neonatal distress"); MSF, *Haïti : MSF contrainte de suspendre les activités de la Maternité Isaïe Jeanty face à l'escalade des violences* (Jun. 23, 2026), https://www.msf.ch/nos-actualites/communiques-presse/haiti-msf-contrainte-suspendre-activites-maternite-isaie-jeanty (describing women's access to health services in Cité Soleil as essentially nonexistent following the suspension of activities at Maternity Isaïe Jeanty and the MSF hospital due to violence by armed groups); MSF, *MSF resumes activities at the Isaïe Jeanty Maternity hospital* (Aug. 6, 2026), https://www.msf.org/haiti-msf-resumes-activities-isaie-jeanty-maternity-hospital (describing three-week suspension of operation of maternity hospital in Cité Soleil, where access to health services is otherwise scarce, due to armed group violence); POHDH, *BILAN SEMESTRIEL 2026: Crise de gouvernance renforcée et détérioration des conditions socioéconomiques, la POHDH dresse le bilan des six premiers mois de l'année 2026*, p. 22 (Jul. 30, 2026), https://pohdh-ht.org/media/documents/BILAN_SEMESTRIEL_POHDH_juillet_2026.pdf (reporting on inaccessibility of maternity facilities due to insecurity); Tirana Hassan, *The Crisis I Witnessed in Haiti*, TIME Magazine (Jun. 26, 2026), https://time.com/article/2026/06/25/the-crisis-i-witnessed-in-haiti/ (describing example of insecurity impeding timely care for a woman in labor); Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ (reporting on women being forced to choose between food and menstrual products).

[254] Doctors Without Borders, *Women risk their lives to access sexual and reproductive health care in Haiti* (Aug. 19, 2026), https://www.doctorswithoutborders.org/latest/women-risk-their-lives-access-sexual-and-reproductive-health-care-haiti ("Haiti has the highest maternal mortality rate in the Americas.").

[255] *See, e.g.*, Global Protection Cluster, *Haiti Protection Analysis Update*, p. 10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update ("Only 25% of survivors whose cases were reported by GBV service providers accessed care within the critical 72-hour window for effective HIV prevention and emergency contraception; 58% accessed services between 72 hours and one month after the incident, while 17% accessed services more than one month later."); UN News, *Haiti's freefall demands urgent global action as millions face hunger and violence* (Apr. 10, 2026), https://news.un.org/en/story/2026/04/1167283 ("[O]nly 30 per cent of survivors receive medical assistance or psychological support within the critical 72 hours after sexual violence."); UN, *Panel of Experts Report to the UN Security Council*, UN Doc. S/2026/241, ¶ 31 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("Since 2022, Médecins sans frontières has recorded that about 67% of survivors [of SGBV] arrive too late to receive HIV post-exposure prophylaxis and 59% of survivors missed the window for emergency contraception."); UN, *Daily Press Briefing by the Office of the Spokesperson for the Secretary-General* (Sep. 25, 2026), https://press.un.org/en/2026/db260925.doc.htm ("[O]nly 20 per cent of rape victims receiv[ed] medical treatment within the first 72 hours, which is a critical window for treatment."); UNFPA, *Situation Report: Haiti: Displacement from escalation in gang violence 1 July - 31 August 2026* (Sep. 2026), https://www.unfpa.org/sites/default/files/resource-pdf/Situation%20Report_Haiti_Jul-Aug%202026.pdf ("Access to medical care for survivors in the critical first 72 hours following an incident of sexual violence remains limited in frontline and conflict-affected areas."); *id.* (stating that insecurity and damaged infrastructure reduce the availability of specialized services to survivors of sexual violence, "resulting in delays to life-saving interventions and compromising survivor-centred care in line with medical ethics"). These harms are compounded by the burdens of forced pregnancy in the absence of effective maternal care or financial and psychosocial support for raising children. *See* note 240.

[256] Local organizations working on women's rights explain a range of gaps in accessibility to police protection and legal recourse for survivors of GBV. First, in addition to the general capacity challenges of the police and court dysfunction in the present moment, including failures to hold specialized sessions required for serious cases of sexual assault (*see also* Sections II, III, IV), they emphasize specific inabilities to reach survivors, investigate allegations, and execute warrants in areas controlled by armed groups, at displacement sites, and in rural parts of the country. Second, they report a dearth of protections for victims and witnesses and of qualified legal support for survivors, inhibiting reporting and participation in proceedings. Third, they describe that police and judicial personnel frequently stigmatize survivors, resist initiating investigations – especially where the perpetrator is not known, and push survivors towards settlement with their assailants (something Abigail Derolian, Director of GBV at Nègès Mawon emphasized is unlawful for rape cases). Fourth, they point to a lack of adequate sanctions and reparations. Maître Derolian shared as an example instances where child rapists received sentences as low as 14 months or six years even though the law provides for life imprisonment, and emphasized limited access to damages for survivors. Fifth, they highlighted financial and procedural barriers to reporting, including the effective – though not formal – requirement to obtain a medical certificate, which can be prohibitive for survivors due to challenges accessing timely medical care, scarcity of qualified professionals, and sometimes improper fees. (Notes on file with authors). *See also, e.g.*, Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Submission on women's rights in Haiti (July 2026) by Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations to the UN Human Rights Council for Haiti's Universal Periodic Review*, ¶¶ 36-41 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf (providing overview of access to justice challenges for women and girls); Coalition of Haitian and Solidarity Human Rights Organizations, *Joint Submission to the United Nations Human Rights Council Universal Periodic Review Re Haiti Justice Sector,* ¶¶ 6, 13, 20, 34-38 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Justice-Sector-by-HaitiHumanRightsCoalition-EN-w-cover.pdf (describing limitations of Haiti's justice system for survivors of GBV); CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, p. 20, 27-33 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (providing overview of structural failings that limit support and accountability for survivors of GBV, including in the justice, health, and political contexts); Global Protection Cluster, *Haiti Protection Analysis Update*, p. 10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update ("Access to justice remains equally limited [for survivors of GBV]. The issuance of medico-legal certificates continues to be restricted by shortages of accredited personnel and the persistence of unauthorized fees."); UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, p. 10 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf (observing that many survivors of GBV "do not file complaints with police or courts due to a lack of trust in the justice system and fear of reprisals, preferring local mediation or no action, outcomes that contribute to impunity"); Marion Bethel, *International Women's Day: Support for Haiti must focus on the security of women*, Miami Herald (Mar. 6, 2026), https://www.miamiherald.com/opinion/op-ed/article314950721.html ("[GBV] is fueled by systemic impunity within a justice system lacking resources and security, which cannot offer protection or reparation to victims."); UNFPA, *Women and girls must enjoy their rights and fair justice in Haiti* (Mar. 11, 2026), https://haiti.unfpa.org/en/news/women-and-girls-must-enjoy-their-rights-and-fair-justice-haiti (detailing barriers to accessing justice for women); Marie Goretti Nduwayo, *Haiti opens first state-supported safe houses for women and girls, as gangs continue to weaponize sexual violence*, UN Women (Jun. 12, 2026), https://www.unwomen.org/en/news-stories/press-briefing/2026/06/haiti-opens-first-state-supported-safe-houses-for-women-and-girls-as-gangs-continue-to-weaponize-sexual-violence (describing legal support for survivors of GBV as "largely unavailable"). The UN reports that 110 sexual violence cases have been submitted to the "Ministry of Justice and Public Security's commission – created in 2024 to guarantee that the prosecution of sexual-violence cases is prioritized," with 29 cases "resolved" and one case "closed without further action." UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 35 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74. These numbers are miniscule relative to the scale of GBV the UN itself reports (*see* notes 226-229), and highlight the ongoing lack of access to justice for survivors of GBV. A similar dynamic can be observed with official reporting – the PNH received only 378 reports of GBV incidents in the first three months of the year. *Compare* BINUH, *Quarterly Report on the Human Rights Situation in Haiti (January – March 2026)*, p. 20 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-

human-rights-situation-in-haiti-jan-march-2026 *with* Global Protection Cluster et al., *Haïti : Snapshot sur les incidents de violences basees sur la genre (VBG) - De janvier à mars 2026* (May 5, 2026), https://reliefweb.int/report/haiti/haiti-snapshot-sur-les-incidents-de-violences-basees-sur-la-genre-vbg-de-janvier-mars-2026 (reporting 1927 incidents of GBV for the same period); *see further* notes 198-199 (discussing promise and limitations of nascent specialized tribunal for mass crimes, including sexual violence)]. Accountability is particularly limited for GBV allegations involving police or prison staff. According to Rosy Auguste Ducéna, the General Inspector of the PNH (IGPNH), which is responsible for addressing misconduct by PNH and penitentiary officials, attaches no importance to GBV cases and has been particularly dysfunctional recently. (Notes on file with authors).

[257] *See* UN General Assembly & Security Council, *Report of the Secretary-General on Children and armed conflict*, UN Doc. A/80/723-S/2026/357, ¶¶ 69-81 (Jun. 16, 2026), https://docs.un.org/en/A/80/723 (reporting 2,088 verified grave violations against 1,661 children in Haiti in 2025, the sixth-worst in the world); UN, *Vanessa Frazier (Special Representative) on Haiti - Security Council, 10198th meeting* (Jul. 20, 2026), https://webtv.un.org/en/asset/k14/k14x2jurhe (reporting assessment as UN SRSG for children and armed conflict that "[t]he situation of children in Haiti is among the most alarming anywhere in the world" and that data indicates "that Haiti's children are not only collateral victims of the crisis, they are being targeted, exploited, and instrumentalized by armed actors").

[258] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, ¶¶ 72-73 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("Although the exact number of children within gangs is difficult to estimate, a severe uptick in recruitment, in both West and Artibonite Departments, has been reported to the Panel by residents and civil society representatives working in gang-controlled areas, as well as by officers involved in security operations," triggered at least in part by casualties "sustained as a result of security operations."); UN General Assembly & Security Council, *Report of the Secretary-General on Children and armed conflict*, UN Doc. A/80/723-S/2026/357, ¶ 80 (Jun. 16, 2026), https://docs.un.org/en/A/80/723 (expressing "deep[] alarm[at] the increase in the recruitment and use, killing and maiming, and abduction of children"); *see also* OHCHR, *High Commissioner Türk: We need all eyes on Haiti* (Oct. 2, 2026), https://www.ohchr.org/en/statements-and-speeches/2026/10/high-commissioner-turk-we-need-all-eyes-haiti ("Some 30 to 50 percent of gang members are children. Last year, the recruitment and use of children by gangs nearly tripled."); Global Protection Cluster, *Haiti Protection Analysis Update*, p. 10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update ("Most gang members are young people. . . . some as young as 10 years old."); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, p. 51 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("Losses in gangs' ranks trigger further recruitment, including of children. An individual with first knowledge on gang dynamics revealed that members of 5 Segond and Grand Ravine gangs are not only recruited within gang-controlled areas, but also from youth coming from places such as Delmas and Pétion-Ville communes, who view joining gangs as a form of employment."); UN, *Vanessa Frazier (Special Representative) on Haiti - Security Council, 10198th meeting* (Jul. 20, 2026), https://webtv.un.org/en/asset/k14/k14x2jurhe ("Estimates suggest that children may account for more than half of gang members in Haiti.").

[259] *See, e.g.*, Global Protection Cluster, *Haiti Protection Analysis Update*, p. 10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update ("[T]he vast majority of [young people in armed groups] have been involved in serious criminal violence. . . . [and] are exploited in a range of roles, including domestic tasks such as cleaning and cooking, surveillance of police movements, transporting ammunition, delivering extortion payment letters to businesses, and participating in clashes against other armed groups and security forces. Girls face heightened vulnerability to sexual exploitation and are often forced into sexual relationships with members of armed groups, while other children are coerced into violent criminal activities."); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, pp. 6, 18 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting that "[b]oys remain particularly exposed to recruitment for various criminal activities," from logistics and surveillance to more serious acts, while girls are generally victims of sexual violence, including "so-called 'romantic' relationships with armed group members); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (January – March 2026)*, p. 15 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (reporting similar findings); UN General Assembly & Security Council, *Report of the Secretary-General on Children and armed conflict*, UN Doc. A/80/723-S/2026/357, ¶¶ 1, 70 (Jun. 16, 2026), https://docs.un.org/en/A/80/723 (reporting that most children recruited by armed groups and self-defense groups in 2025 "were used in combat roles (378 boys) and support roles (281 children), with girls disproportionately exposed to sexual violence"); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 11 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("OHCHR has also observed that gangs continue to inflict violence on children. . . . Boys are used for activities ranging from surveillance and extortion collection to other violent criminal activities such as killings, kidnappings, and armed clashes with the police. Girls are typically subjected to sexual violence, exploitation, and slavery, forced domestic labour, and, in some cases, coerced participation in criminal activities."); *see also* Jess Obert, *US Funding Cuts Fuel Child Recruitment Into Haitian Armed Groups*, New Humanitarian (Aug. 19, 2026), https://www.thenewhumanitarian.org/news-feature/2026/08/19/us-funding-cuts-fuel-child-recruitment-haitis-armed-group (describing a recruited child being forced into progressively more violent acts, including murder, and the general practice of using teenagers for odd jobs, as informants and cannon fodder, and to attack police); *cf.* CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, pp. 13-14 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (documenting research findings about female participation in violent economics as a challenge to conventional narratives regarding perpetrators and victims).

[260] *See, e.g.,* UN, *Vanessa Frazier (Special Representative) on Haiti - Security Council, 10198th meeting* (Jul. 20, 2026), https://webtv.un.org/en/asset/k14/k14x2jurhe (reporting as SRSG for children and armed conflict that "[c]hildren are being killed, maimed, abducted, recruited and used by armed gangs, displaced from their homes, denied access to education and deprived of basic protection and legal identity"); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, ¶¶ 69-70 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (describing indiscriminate shooting of civilians, including children, by armed groups, and the shooting of a minor for failing to comply with orders by an armed group

member); BINUH, *Flash Report - Intensification of Gang Violence in the Plaine du Cul-de-Sac Area and Cité Soleil (March - July 2026)*, pp. 17, 19 (Aug. 6, 2026), https://binuh.unmissions.org/en/document-library/flash-report-intensification-of-gang-violence-in-the-plaine-du-cul-de-sac-1 (reporting on children as young as seven being killed or executed by armed groups); UN General Assembly & Security Council, *Report of the Secretary-General on Children and armed conflict*, UN Doc. A/80/723-S/2026/357, ¶¶ 71, 75 (Jun. 16, 2026), https://docs.un.org/en/A/80/723 (recording 339 children killed, 281 maimed, and 277 abducted in 2025); RNDDH, *Massacres à Kenscoff en juillet et en août 2026 : Le CSPN livre la population haïtienne sans protection ni défense,* ¶¶ 33-34 (Sep. 16, 2026), https://web.rnddh.org/massacres-a-kenscoff-en-juillet-et-en-aout-2026-le-cspn-livre-la-population-haitienne-sans-protection-ni-defense/?lang=en (reporting that seven children were killed during the July and August 2026 massacres in Kenscoff); https://www.unicef.org/haiti/en/press-releases/unicef-welcomes-release-women-and-children-kenscoff-and-calls-stronger-protection-0 (reporting on the abduction of six children in the same Kenskoff attacks and observing that "[k]illings, abductions and other grave violations have become a consistent threat to children" in Haiti); POHDH, *BILAN SEMESTRIEL 2026: Crise de gouvernance renforcée et détérioration des conditions socioéconomiques, la POHDH dresse le bilan des six premiers mois de l'année 2026*, p. 7 (Jul. 30, 2026), https://pohdh-ht.org/media/documents/BILAN_SEMESTRIEL_POHDH_juillet_2026.pdf (reporting that three children were killed during clashes between rival armed groups in Plaine du Cul-de-Sac in April 2026, and 14 children killed by the 5 Segond armed group in Kenscoff in July 2026); Edith M. Lederer, *UN expert: Haiti has a chance now to tackle gang violence as new international force deploys*, Associated Press (Mar. 16, 2026), https://apnews.com/article/un-haiti-gang-suppression-force-us-1e370b6e0fd40ac9dad33751e08c6cea?utm_source=copy&utm_medium=share (reporting on video of armed group leader beating young boys suspected of trying to flee his group's control); *see also* Jacqueline Charles, *U.N. adds three more Haitian gangs to child violations list as violence surges,* Miami Herald (Jul. 13, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316490122.html ("[C]hildren continue to be recruited, killed, maimed, kidnapped and subjected to sexual violence."); Section II (*Continuing kidnapping epidemic*). Children are relatively less likely to be reported kidnapped than adults, but abductions are consistently recorded. *See, e.g.*, Global Protection Cluster, *Haiti Protection Analysis Update*, p. 7 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (reporting that armed groups kidnapped eight boys and four girls between January 1 and July 31, 2026); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 9 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (reporting that 6% of the recorded kidnapping between March 1, 2025 and January 15, 2026 involved children); UN, *Report of the Secretary-General on the United Nations Integrated Office in Haiti,* UN Doc. S/2026/325, ¶¶ 20-21 (Apr. 14, 2026), https://www.un.org/sexualviolenceinconflict/wp-content/uploads/2026/04/report/united-nations-integrated-office-in-haiti-report-of-the-secretary-general/8788fc76-904c-49e0-abe6-6bab89bcf2de.pdf (recording the abduction of 9 girls and 14 boys between December 2025 and February 2026); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (January – March 2026)*, p. 14, note 27 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (reporting at least six children kidnapped between January 1 and March 31, 2026, though actual figures are likely higher due to underreporting).

[261] *See, e.g.*, Global Protection Cluster, *Haiti Protection Analysis Update*, p. 10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (reporting that girls recruited into armed groups "face heightened vulnerability to sexual exploitation and are often forced into sexual relationships with members of armed groups"); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, ¶ 75 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (reporting that 16% of the 2,485 victims of sexual violence treated by MSF in Port-au-Prince between January and May 2026 were minors); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, p. 18 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting that between April and June 2026, "dynamics concerning the trafficking and exploitation of children by gangs continued[, with t]he majority of the 26 gangs active in the country continu[ing] to resort to the recruitment and exploitation of children, in a persistent context of poverty, forced displacement, and deterioration of public services"); UN General Assembly & Security Council, *Report of the Secretary-General on Children and armed conflict*, UN Doc. A/80/723-S/2026/357, ¶ 72 (Jun. 16, 2026), https://docs.un.org/en/A/80/723 (verifying sexual violence against 166 children (164 girls) in 2025, the 5th worst in the world); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, pp. 6, 18 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting on armed groups engaging in trafficking and exploitation of children); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (January – March 2026)*, p. 15 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (reporting that "[g]irls, and to a lesser extent boys, are often exposed to sexual violence, including sexual exploitation and slavery, perpetrated by gangs" and that "the majority of the 26 gangs operating in the country are involved in child trafficking"); UN, *Report of the Secretary-General on the United Nations Integrated Office in Haiti,* UN Doc. S/2026/325, ¶ 23 (Apr. 14, 2026), https://www.un.org/sexualviolenceinconflict/wp-content/uploads/2026/04/report/united-nations-integrated-office-in-haiti-report-of-the-secretary-general/8788fc76-904c-49e0-abe6-6bab89bcf2de.pdf ("Gangs continued to commit human rights abuses, notably in areas under their control, including . . . widespread sexual violence – particularly affecting girls and young women, including rape, sexual exploitation and sexual slavery – and child trafficking for recruitment and exploitation."); UN News, *Haiti's freefall demands urgent global action as millions face hunger and violence* (Apr. 10, 2026), https://news.un.org/en/story/2026/04/1167283 ("[O]ne in six GBV survivors is under 18."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 10 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (reporting on coercion, even of young children, "into so-called 'sentimental relationships' with gang members and [made] subject[] to prolonged sexual exploitation"); OCHA, *Haiti Crisis in Numbers (as of 7 May 2026)* (May 7, 2026), https://www.unocha.org/publications/report/haiti/haiti-crisis-numbers-7-may-2026 ("Haiti ranks among the five countries with the highest number of child victims of sexual violence."); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (January – March 2026)*, p. 20 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (documenting that according to the PNH, 83% of the 378 GBV incidents reported to the police between January and March 2026 involved children as victims). According to local organizations working on women's rights, girls are particularly vulnerable to compounding harms from sexual violence because their young bodies are more significantly affected by the physical and psychological trauma of assault, they experience higher obstetric risks and mortality due to forced pregnancy, and they are less equipped for parenthood. (Notes on file with authors).

Local organizations working on human rights share that "***restavek***" girls – children staying with host families who promise education in return for household help – are exposed to multiple overlapping forms of vulnerability, including SEA, denial of education, forced domestic labor, physical and psychological violence within host households, and economic exploitation. The last available national statistics on child labor published on the UNICEF website indicates that there were approximately 207,000 children living in domestic work situations at the time of the assessment (which appears to have taken place in 2014). OFASO pointed to this data and suggested that it is reasonable to assume that children from the poorest backgrounds, especially if they have been separated from their families, are vulnerable to exploitation, as the vulnerability factors that contribute to child domestic labor and exploitation have worsened (most notably forced displacement, poverty, food insecurity, school closures, and family separation). (Notes on file with authors). *See also* UNICEF, *Child Protection: A safe environment for children*, https://www.unicef.org/haiti/en/child-protection (last visited Oct. 20, 2026) (asserting that "207,000 children live in unacceptable domestic work situations"); U.S. Department of State, *2026 Trafficking in Persons Report: Haiti*, https://www.state.gov/reports/2026-trafficking-in-persons-report/haiti/ (last visited Oct. 20, 2026) ("A large proportion of Haiti's trafficking cases involve children in forced labor and sex trafficking in child domestic servitude (*restavek*) situations, in which children are often physically abused, receive no payment for services, and have significantly lower school enrollment rates. Children are exploited in agriculture, domestic services, begging, construction, fisheries, and street vending. . . . Observers reported the number of IDPs fleeing violence in Port-au-Prince to other departments increased children's risks to forced domestic work and sexual exploitation in the *restavek* system. Children in orphanages and foster care remain vulnerable to trafficking. Many children flee or are cast out of restavek situations and begin to live and/or work on the street, facing further risk of re-trafficking. Traffickers target Haitian children and adults who are stateless or at risk of becoming stateless. Observers reported 30 percent of children aged one to five years old were not registered at birth and were are particularly vulnerable to trafficking.").

[262] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, ¶ 73, p. 71 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714.

[263] Children are the majority of IDPs. *See* IOM, *Haiti – Report on the internal displacement situation – Round 14 (August 2026)*, p. 8 (Sep. 23, 2026), https://dtm.iom.int/reports/haiti-report-internal-displacement-situation-round-14-august-2026?close=true (reporting children as 52% of all IDPs – primarily outside of displacement sites due to their particularly difficult living conditions, which lead parents to place children with their social networks whenever possible); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, p. 19 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting that more than 51% of forcibly displaced persons in May 2026 were children); UNICEF, *Haiti Humanitarian Situation Report No. 2 (Mid- Year), 30 June 2026*, p. 1 (Aug. 11, 2026), https://www.unicef.org/documents/haiti-humanitarian-situation-report-no-2-mid-year-30-june-2026 ("A total of 1.5 million people, including 751,000 children are displaced."). Displaced children, in turn, face greater hunger, health, shelter, and protection risks (including GBV and trafficking), and are more likely to miss out on education (especially girls). In fact, conditions at displacement sites are so adverse for children that families find other options for them whenever possible. *See, e.g.*, IOM, *Haiti – Update on the displacement situation in spontaneous sites (June 2026)*, p. 1 (Jul. 12, 2026), https://dtm.iom.int/reports/haiti-update-displacement-situation-spontaneous-sites-june-2026?close=true (assessing that displaced children face increased health and protection risks, including GBV); IOM, *Haiti – Report on the internal displacement situation – Round 14 (August 2026)*, p. 8 (Sep. 23, 2026), https://dtm.iom.int/reports/haiti-report-internal-displacement-situation-round-14-august-2026?close=true ("A persistent difference is observed between IDPs living in camps and those living outside camps. In camps, adults make up the majority of the displaced population (66% compared to 34% children), whereas outside camps, children account for more than half of the IDPs (55% compared to 45% adults). This disparity is largely due to the particularly difficult living conditions in the camps, which lead some displaced families to entrust their children to relatives or send them to live in other localities, often outside the Port-au-Prince Metropolitan Area (ZMPP)."); IOM, *Haiti's Displacement Crisis Hits Record 1.5 Million Amid Escalating Violence* (Jun. 5, 2026), https://www.iom.int/news/haitis-displacement-crisis-hits-record-15-million-amid-escalating-violence ("Across displacement sites and host communities, people report critical shortages of shelter, food, clean water, healthcare and psychosocial support. . . . Children . . . remain among the most vulnerable."); Global Protection Cluster, *Haiti Protection Analysis Update*, p. 8 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update ("Living conditions in displacement sites remain extremely precarious . . . children remain vulnerable to family separation, child labour, trafficking, recruitment by armed groups, and psychological distress."); UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, p. 10 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf ("In displacement sites, 49.23 per cent of girls and 36.91 per cent of boys are out of school. This compares to a pre-crisis enrolment rate of 93.87 per cent.").

[264] *See* IOM, *Haiti's Displacement Crisis Hits Record 1.5 Million Amid Escalating Violence* (Jun. 5, 2026), https://www.iom.int/news/haitis-displacement-crisis-hits-record-15-million-amid-escalating-violence (describing children as "among the most vulnerable" to critical shortages of food and clean water); *see further* Section V (*Access to food*).

[265] *See, e.g.*, UN, *Vanessa Frazier (Special Representative) on Haiti - Security Council, 10198th meeting* (Jul. 20, 2026), https://webtv.un.org/en/asset/k14/k14x2jurhe (asserting assessment as the UN SRSG for children and armed conflict that there is an education – and therefore protection – crisis for children in Haiti, with thousands of schools closed); POHDH, *BILAN SEMESTRIEL 2026: Crise de gouvernance renforcée et détérioration des conditions socioéconomiques, la POHDH dresse le bilan des six premiers mois de l'année 2026*, pp. 12, 21 (Jul. 30, 2026), https://pohdh-ht.org/media/documents/BILAN_SEMESTRIEL_POHDH_juillet_2026.pdf ("According to camp officials—and as corroborated by observations made by the POHDH—the majority of displaced children in the camps are not attending school. There are various reasons why these [displaced] children are not attending school. Some come from families that have been so severely impoverished by the insecurity in the region that they cannot afford to send their children to school. Others simply have not been able to find schools whose tuition fees fit within their limited means."); UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, p. 10 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf; Pierre Josué Agénor Cadet, *Rentrée scolaire 2026-2027 : l'école à l'épreuve de la crise haïtienne*, Le Nouvelliste (Sep. 14, 2026), https://lenouvelliste.com/article/271907/rentree-scolaire-2026-2027-lecole-a-lepreuve-de-la-crise-haitienne (identifying obstacles

to attending school, including insecurity and deteriorating economy); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (January – March 2026)*, p. 15 (May 8, 2026),

https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 ("Schools and child-friendly spaces . . . remain fragile due to insecurity and lack of funding."); *see further* Section V (*Access to education*).

[266] UN General Assembly & Security Council, *Report of the Secretary-General on Children and armed conflict*, UN Doc. A/80/723-S/2026/357, ¶ 76 (Jun. 16, 2026), https://docs.un.org/en/A/80/723 (reporting 34 verified incidents, including threats and attacks on aid deliveries).

[267] "[Child recruitment] is fueled by a complex interplay of coercion and structural factors exploited through the criminal governance established by armed groups in neighborhoods under their control. Threats and violence against children and their families facilitate recruitment, while poverty, food insecurity, school dropout and unmet basic needs can drive children to join armed groups in search of economic support, protection or a sense of belonging. Children from low-income and/or single-headed households are particularly at risk, while close family or community ties with armed group members can further facilitate recruitment." Global Protection Cluster, *Haiti Protection Analysis Update*, pp. 10-11 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update; *see also, e.g.*, UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, p. 61 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("[D]isplacement and the disruption of protection services increase risks of recruitment of vulnerable children or re-recruitment of those leaving gangs, while the absence of adequate support makes reintegration unsustainable and heightens the risk of exploitation or renewed involvement in gangs."); UN, *Panel of Experts Report to the UN Security Council*, UN Doc. S/2026/241, ¶ 34 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("Children are often compelled to join gangs due to economic hardship, direct threats or family separation, with some perceiving association with gang members as a means of survival or protection"); UN, *Vanessa Frazier (Special Representative) on Haiti - Security Council, 10198th meeting* (Jul. 20, 2026), https://webtv.un.org/en/asset/k14/k14x2jurhe ("Children are recruited because of poverty, insecurity, family separation, displacement, lack of schooling and the absence of viable alternatives. This is a devastating indicator of the extent to which armed gangs are exploiting vulnerability."); Jess Obert, *US Funding Cuts Fuel Child Recruitment Into Haitian Armed Groups*, New Humanitarian (Aug. 19, 2026), https://www.thenewhumanitarian.org/news-feature/2026/08/19/us-funding-cuts-fuel-child-recruitment-haitis-armed-group ("The risk of [child] recruitment is particularly high among the displaced."). "Children are particularly vulnerable to the privations of Haiti's deepening humanitarian crisis," which escalates the impact of harms and leaves them more vulnerable to recruitment. Coalition of Haitian and Solidarity Human Rights Organizations, *Joint Submission to the United Nations Human Rights Council Universal Periodic Review Re Haiti Justice Sector,* ¶¶ 39-43 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Justice-Sector-by-HaitiHumanRightsCoalition-EN-w-cover.pdf; *see also, e.g.*, CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, pp. 22-23 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (describing the distinct vulnerabilities of children to privations, including long-term cognitive and emotional impacts, as "the biological footprint of state collapse, health system failure, and the economic stranglehold of armed governance"). Vulnerability to recruitment is highest for children from poor and unstable backgrounds, who can be lured by promises of food and safety. *See, e.g.*, UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 11 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (finding that "children from dysfunctional family and social environments . . . seek 'safety' within gangs"); The Independent, *How Haiti's violent drugs gangs are recruiting hungry homeless children with promises of food* (Apr. 9, 2026), https://www.independent.co.uk/news/world/americas/haiti-gangs-recruit-children-food-hunger-war-b2950395.html (describing armed groups as "preying" on the hunger of children, recruiting some by force and manipulating the extreme poverty of others). In general, armed groups have been leveraging social media, with images of wealth and power, to recruit children. *See, e.g.,* Latin American Post, *Haiti Faces Gangs as Childhood Becomes the Front Line Again* (Apr. 12, 2026), https://latinamericanpost.com/americas/haiti-faces-gangs-as-childhood-becomes-the-front-line-again/; Haitian Times, *US pledges to crack down on Haitian gangs making money off social media* (Jul. 21, 2026), https://haitiantimes.com/2026/07/21/us-crackdown-haitian-gangs-social-media/ ("Younger gang members also post music videos and wave cash they've earned in an effort to recruit children"); *see also* note 70.

[268] *See, e.g.*, UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, ¶ 74 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("Summary executions of children allegedly associated with gangs have been reported, carried out by security forces and self-defence groups."); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, pp. 3, 5, 13-14 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (reporting that at least six children were killed or injured during drone operations implicating the PNH, FAd'H, the government's "task force" and foreign private military contractors between April and June 2026); UN General Assembly & Security Council, *Report of the Secretary-General on Children and armed conflict*, UN Doc. A/80/723-S/2026/357, ¶¶ 71-72, 80-90) (Jun. 16, 2026), https://docs.un.org/en/A/80/723 (reporting that in 2025, 76 children were killed or maimed by the PNH, 24 by the Special Security Task Force, 130 by self-defense groups, and 92 in crossfire during PNH operations, while 5 children were sexually assaulted by the PNH and 55 by self-defense groups; and expressing deep alarm at the killing and maiming of children, including the rising number of child victims from drone strikes); UN, *Report of the Secretary-General on the United Nations Integrated Office in Haiti,* UN Doc. S/2026/325, ¶ 22 (Apr. 14, 2026), https://www.un.org/sexualviolenceinconflict/wp-content/uploads/2026/04/report/united-nations-integrated-office-in-haiti-report-of-the-secretary-general/8788fc76-904c-49e0-abe6-6bab89bcf2de.pdf (reporting that 59 girls and 162 boys were among those killed in "police operations, inter-gang clashes or incidents involving self-defence groups and spontaneous mobs" in 2025); *see also* BINUH, *Quarterly Report on the Human Rights Situation in Haiti (January – March 2026)*, p. 16 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 ("[C]hildren associated with gangs are often treated as perpetrators rather than victims."); Amnesty International, *Haiti: Drone attacks raise serious human rights concerns and threaten children* (May 12, 2026), https://www.amnesty.org/en/latest/news/2026/05/haiti-ataques-con-drones-generan-graves-preocupaciones-de-derechos-

humanos-y-su-impacto-en-la-ninez/ (denouncing the indiscriminate use of armed drones against children by the Haitian state). According to ORDEDH, government security forces lack nonlethal intervention protocols appropriate for children and instead prioritize their own protection. As a result, they rarely carry out arrests and "all too often" resort to lethal force. (Notes on file with authors).

[269] In reporting on verified violations from 2025, the SRSG for children and armed conflict opined that "the number of children killed and maimed by the Haitian National Police and the Special Security Task Force increased substantially[, and i]f the high number of violations against children were to be repeated in 2026, without meaningful improvement, the Haitian National Police and the Special Security Task Force should be listed" pursuant to UNSC resolutions as "commit[ting] violations and abuses against children in contravention of applicable international law." UN General Assembly & Security Council, *Report of the Secretary-General on Children and armed conflict*, UN Doc. A/80/723-S/2026/357, ¶ 333 (Jun. 16, 2026), https://docs.un.org/en/A/80/723; UNSC, *Resolution 2225 (2015)*, UN Doc. S/RES/2225, ¶ 4 (Jun. 18, 2015), https://docs.un.org/en/S/RES/2225(2015). There is no indication of such an improvement; instead harms against children appear to be escalating. *See* note 257-259.

[270] BINUH, *Flash Report - Intensification of Gang Violence in the Plaine du Cul-de-Sac Area and Cité Soleil (March - July 2026)*, p. 24 (Aug. 6, 2026), https://binuh.unmissions.org/en/document-library/flash-report-intensification-of-gang-violence-in-the-plaine-du-cul-de-sac-1 ("To date, the [Human Rights Service (**HRS**)] has received no information indicating that the authorities have opened investigations to establish the circumstances and responsibilities relating to deaths and injuries caused during security force operations, including in cases where children were affected."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶¶ 21, 26 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (reporting the lack of investigation into killings and injuries during security force operations that affected 89 children, as well as the failure to implement any mechanism for accountability, effective remedy, or justice).

[271] *See, e.g.*, BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, p. 18 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 ("[I]nstitutional and community responses [to violence and exploitation of children by armed groups] remain insufficient. Social protection mechanisms and essential services, particularly in the areas of education, mental health, and vocational training, continue to be limited, especially in marginalized areas under gang influence."); UNICEF, *Haiti Humanitarian Situation Report No. 2 (Mid-Year), 30 June 2026*, p. 2 (Aug. 11, 2026), https://www.unicef.org/documents/haiti-humanitarian-situation-report-no-2-mid-year-30-june-2026 ("As of 30 June 2026, the Haiti Humanitarian Action for Children (HAC) appeal remains underfunded, with a 79 per cent funding gap, significantly constraining UNICEF's ability to maintain essential services and respond to rising humanitarian pressures . . . with particularly critical gaps in education, emergency preparedness and WASH."); UN, *Vanessa Frazier (Special Representative) on Haiti - Security Council, 10198th meeting* (Jul. 20, 2026), https://webtv.un.org/en/asset/k14/k14x2jurhe (assessing as SRSG for children and armed conflict that "needs are far greater than the current resources" and providing summation of types of sustainable resources needed); Jess Obert, *US Funding Cuts Fuel Child Recruitment Into Haitian Armed Groups*, New Humanitarian (Aug. 19, 2026), https://www.thenewhumanitarian.org/news-feature/2026/08/19/us-funding-cuts-fuel-child-recruitment-haitis-armed-group ("Preventive programs, including education and vocational training that give displaced adolescents something to do, have been the most affected by the [USAID aid] cuts. . . . The impact of the cuts also extends to work upstream of the violence that seeks to fight food insecurity[, even as h]unger and desperation are powerful drivers of gang recruitment."); Global Protection Cluster, *Haiti Protection Analysis Update*, p. 11 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update.

[272] According to Marie Kattia Dorestant Lefruy, Attorney and Co-Director of the BAI, existing measures for reintegration of children, including the 2023 Protocol of Agreement on the Transfer, Reception, and Care of Children Associated with Armed Groups Encountered During Security Operations on National Territory and the Prevention and Rehabilitation Programme against Children and Youth recruitment (PREJEUNES) program launched by the Haitian government together with UNICEF in 2025, remain largely insufficient given the scale of the current security crisis and the highly specialized care needs of any children leaving armed groups, including psychological support to treat post-traumatic stress disorder, medical care for detoxification following forced drug use, and tailored gynecological and psychological care for young girls subjected to sexual harms. (Notes on file with authors). *See also, e.g.*, Global Protection Cluster, *Haiti Protection Analysis Update*, p. 11 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (reporting that "sustainable reintegration remains severely constrained by persistent insecurity, continued population displacement, risks of re-recruitment, stigma, family and community rejection, and concerns over reprisals" and that implementation of the Protocol is incomplete, and that "the national child protection system - including the [BPM] and the Institute of Social Welfare and Research (**IBESR**) - must be strengthened, as both institutions currently lack the financial and human resources required to meet the growing scale of needs of children associated with armed groups); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, UN Doc. S/2026/714, p. 61 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("[T]he displacement and the disruption of protection services increase the risks of recruitment of vulnerable children or re-recruitment of those leaving gangs, while the absence of adequate support makes reintegration unsustainable and heightens the risk of exploitation or renewed involvement in gangs."); UN, *Vanessa Frazier (Special Representative) on Haiti - Security Council, 10198th meeting* (Jul. 20, 2026), https://webtv.un.org/en/asset/k14/k14x2jurhe (emphasizing that children must be treated "first and foremost as victims," highlighting the immensity and complexity of needs, and assessing that implementation of the Protocol is "uneven," with "an urgent need to standardize procedures, clarify roles, and ensure that all actors apply the protocol consistently"); UN News, *Haïti : les gangs enrôlent toujours plus d'enfants* (Oct. 2, 2026), https://news.un.org/fr/story/2026/10/1159597 ("Measures designed to prevent [children's] recruitment and support their reintegration remain insufficient given the scale of the phenomenon."); Jess Obert, *US Funding Cuts Fuel Child Recruitment Into Haitian Armed Groups*, New Humanitarian (Aug. 19, 2026), https://www.thenewhumanitarian.org/news-feature/2026/08/19/us-funding-cuts-fuel-child-recruitment-haitis-armed-group (reporting that the ability of the IBESR to support the reintegration of children from armed groups is likely to be adversely impacted by UNICEF's shrinking budget – both directly and because community organizations that are crucial for "trusted access" to neighborhoods controlled by armed groups are likewise loosing funding). For an explanation (i) of the PREJEUNES program,

which aims to both protect children from recruitment and offer sustainable reintegration, see UNICEF, *The Haitian Government and UNICEF launch the PREJEUNES programme to address the recruitment of children and youth by armed gangs* (Jul. 10, 2025), https://www.unicef.org/haiti/en/press-releases/haitian-government-and-unicef-launch-prejeunes-programme-address-recruitment; and (ii) of the Protocol, see IJDH, *Human Rights Update - March 2026*, notes 249-250 (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf. A small number of children associated with armed groups have been supported in reintegration (*see* Global Protection Cluster, *Haiti Protection Analysis Update*, p. 13 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (reporting 185 children reintegrated between January and July 2026); UN General Assembly & Security Council, *Report of the Secretary-General on Children and armed conflict*, UN Doc. A/80/723-S/2026/357, ¶¶ 71-72, 80-90) (Jun. 16, 2026), https://docs.un.org/en/A/80/723 (reporting that 573 children were reintegrated in 2025)), but it is dwarfed by the scale of need. The Task Force for implementing the Protocol, which had been signed in 2023, launched only as of June 2026. Global Protection Cluster, *Haiti Protection Analysis Update*, p. 13 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update.

[273] According to Marie Kattia Dorestant Lefruy, Attorney and Co-Director of the BAI, Haiti's juvenile justice system is unable to guarantee children's procedural rights or effective access to justice due to the shortage of specialized juvenile court judges; disruptions to the ability of IBESR to prepare and coordinate social assessment reports required by law before a minor can be tried in court; systematic, prolonged pretrial detention; and the court's inability to ensure the safety of judicial personnel, witnesses, or child victims. Local organizations working on human rights likewise emphasize the inhumane and dangerous conditions of detention for minors, with children confined together with adults and thus at elevated risk of violence and trauma, in addition to the general human rights violations in Haiti's prison system, including lack of food, water, medical care, and adequate space. (Notes on file with authors). *See also* UN, *Vanessa Frazier (Special Representative) on Haiti - Security Council, 10198th meeting* (Jul. 20, 2026), https://webtv.un.org/en/asset/k14/k14x2jurhe (denouncing inhumane detention conditions for children in Haiti); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 38 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("Prolonged detention of children in conflict with the law remains pervasive, despite national and international standards requiring inter alia that it be used only as a measure of last resort and for the shortest appropriate period. This is largely due to limited awareness among competent authorities of the standards governing juvenile justice and the absence of viable alternatives to detention. Delays in prosecuting cases, linked to shortages of judicial personnel and resources, mean that many juveniles spend much of their childhood in prison, in harsh conditions and without access to adequate education or rehabilitation programmes."); notes 202, 208, 220 (documenting inhumane conditions as well as lack of segregated facilities and reintegration-focused services for detained minors).

[274] Disaggregated data is scarce. Some groups with added vulnerabilities identified in available reporting include "homeless women, displaced children, women with disabilities, female-headed households, unaccompanied and separated children, returnees and deportees, and LGBTIQ+ persons," as well as pregnant and postpartum women. *See* Global Protection Cluster, *Haiti Protection Analysis Update*, pp. 9-10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update (reporting these groups "face intersecting forms of discrimination and barriers to accessing protection and services"); IOM, *Haiti's Displacement Crisis Hit Record 1.5 Million Amid Escalating Violence* (Jun. 5, 2026), https://www.iom.int/news/haitis-displacement-crisis-hits-record-15-million-amid-escalating-violence ("Vulnerable profiles remain prominent among returnees, including unaccompanied children, pregnant women and postpartum women, who continue to be received in fragile and often unsafe conditions, with limited access to basic services and protection. Across displacement sites and host communities, people report critical shortages of shelter, food, clean water, healthcare and psychosocial support. Children, pregnant women, persons with disabilities and female-headed households remain among the most vulnerable."); Section VII.

[275] According to local organizations working on human rights, older people are more likely to have mobility and chronic health issues that make it more difficult to flee armed group attacks – exposing them to increasing levels of violence or leaving them trapped in their homes. Older persons likewise face added challenges when displaced due to the lack of adequate accommodation for physical infirmities in shelters and on the road – especially access to latrines and water sources – and the difficulty of accessing medications for managing chronic conditions. (Notes on file with authors). *See also, e.g.*, Global Protection Cluster, *Haiti Protection Analysis Update*, p. 8 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update ("Living conditions in displacement sites remain extremely precarious. . . . Older persons and persons with disabilities face additional barriers to assistance and protection due to inaccessible infrastructure and limited specialized services."); IOM, *Haiti – Update on the displacement situation in spontaneous sites (June 2026)*, p. 3 (Jul. 12, 2026), https://dtm.iom.int/reports/haiti-update-displacement-situation-spontaneous-sites-june-2026?close=true (describing persons older than 60 as particularly vulnerable in displacement sites); CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, pp. 9-10, 20 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (reporting that "[o]lder women, once socially revered, are now targeted," with a sevenfold increase in sexual violence against people over 50 since 2022; and that "[n]o specialized services exist for older survivors, and no social protection systems provide safety nets"); Défenseurs Plus, *SITUATIONAL REPORT On the conditions of detention of detainees at the Reeducation Center for Minors in Conflict with the Law (CERMICOL) March – June 2026*, pp. 36-37 (Aug. 6, 2026), https://defenseursplus.org/en/publications/situational-report-on-the-conditions-of-detention-of-detainees-at-the-reeducation-center-for-minors-in-conflict-with-the-law-cermicol-march-june-2026 (describing added challenges for elderly persons detained in prison due to lack of specialized care or accommodation); RNDDH, *Massacres à Kenscoff en juillet et en août 2026 : Le CSPN livre la population haïtienne sans protection ni défense,* ¶¶ 33-34 (Sep. 16, 2026), https://web.rnddh.org/massacres-a-kenscoff-en-juillet-et-en-aout-2026-le-cspn-livre-la-population-haitienne-sans-protection-ni-defense/?lang=en (identifying 21 persons between the ages of 65 and 90 killed in the July and August Kenscoff massacres); note 235 (reporting on GBV affecting older women).

[276] Local organizations working on human rights share that persons with disabilities face added barriers to fleeing attacks, accessing transport, and navigating displacement; and are at increased risk of GBV. Lack of accessible infrastructure, like ramps for

wheelchair users and specialized hygiene, compounds the challenges. Women with disabilities are especially disadvantaged in accessing education, employment, healthcare, contraception and abortion, menstrual hygiene products, and protection and accountability mechanisms. (Notes on file with authors). *See also, e.g.*, IOM, *Haiti's Displacement Crisis Hits Record 1.5 Million Amid Escalating Violence* (Jun. 5, 2026), https://www.iom.int/news/haitis-displacement-crisis-hits-record-15-million-amid-escalating-violence (reporting that persons with disabilities "remain among the most vulnerable" to "critical shortages of shelter, food, clean water, healthcare and psychosocial support" reported across displacement sites and host communities); CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, pp. 24-25 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 ("People with disabilities in Haiti face compounded GBV risks at every lifecycle stage, yet remain absent from response programming."); IOM, *Haiti - Emergency Tracking Tool 93.2 - Updates on displacement following armed clashes in Cité Soleil (10–22 May 2026)* (May 23, 2026), https://dtm.iom.int/reports/haiti-emergency-tracking-tool-932-updates-displacement-following-armed-clashes-cite-soleil ("Among the displaced population, several vulnerable cases were identified, including . . . persons with disabilities."); Global Protection Cluster, *Haiti Protection Analysis Update*, p. 8 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update; Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Joint Submission on Haiti's Justice Sector (July 2026) by the Coalition of Haitian and Solidarity Human Rights Organizations to the UN Human Rights Council for Haiti's Universal Periodic Review*, ¶ 30 (Jul. 17, 2026),

https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Justice-Sector-by-HaitiHumanRightsCoalition-EN-w-cover.pdf ("*Chans Altenativ* further reports that mentally ill individuals are sometimes placed into prisons without charges and detained for years, and are particularly vulnerable to abuses by both prison officials and other detainees."); Défenseurs Plus, *SITUATIONAL REPORT On the conditions of detention of detainees at the Reeducation Center for Minors in Conflict with the Law (CERMICOL) March – June 2026*, pp. 36-37 (Aug. 6, 2026), https://defenseursplus.org/en/publications/situational-report-on-the-conditions-of-detention-of-detainees-at-the-reeducation-center-for-minors-in-conflict-with-the-law-cermicol-march-june-2026 (describing added challenges of detention for persons with disabilities). Surveys across displacement sites and host communities further indicate that even though persons with disabilities comprise 6.88% of IDPs, they "face systematic exclusion throughout the displacement response," including displacement site governance, and that the historic tendency of government institutions to disregard disability needs has only grown worse with the crisis. UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, pp. 4, 5, 12-13 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf (reporting that "[t]he exclusion of persons with disabilities from site governance is complete," which together with an absence of accessible infrastructure "means that the specific protection, service access, and livelihood needs of this group remain largely unaddressed by the humanitarian response").

[277] Local human rights organizations share that LGBTQI+ individuals face violence, social exclusion, stigma, and discrimination in accessing housing, employment, health care, and protective services. There is evidence that individuals perceived to be LGBTQI+ are at increased risk of verbal and physical abuse by police and violence from armed groups, and specific reports of men perceived as gay being raped in prison, sometimes with government complicity. For example, an armed group emphasized the perceived LGBTQI+ identity of police officer Claudio Cazeau in the video circulated on social media recording his abduction, interrogation, and beating in August 2026. (Notes on file with authors). *See also* Global Protection Cluster, *Haiti Protection Analysis Update*, p. 10 (Sep. 24, 2026), https://globalprotectioncluster.org/latest/publications/haiti-protection-analysis-update ("Heightened vulnerabilities [of GBV] are also reported among . . . LGBTIQ+ persons, who face intersecting forms of discrimination and barriers to accessing protection and services."); CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, pp. 23-24 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 (providing overview of harms, including invisibility as structural violence); Betty Alvarez, *LGBTQ+ Persecution in Haiti: Social Hostility, Threats, and the Absence of Legal Protection*, Human Rights Experts (Jul. 15, 2026), https://thehuman-rights.com/haiti-lgbt-persecution-social-hostility-absence-legal-protection/ (reporting that social hostility is "severe," as embodied in religious opposition, family rejection, community violence, and discrimination in employment, housing, and healthcare – particularly around HIV/AIDS; as well as targeting by armed groups – with vulnerabilities compounded by displacement from home communities and trans individuals facing the highest risk); Moïse Manoël-Florisse, *Confronting the silence that kills trangender Haitians*, Erasing 76 Crimes (May 14, 2026), https://76crimes.com/2026/05/14/confronting-the-silence-that-kills-transgender-haitians/ ("Haitian LGBTIQ people face . . . physical violence from gangs that specifically target them."); IJDH et al., *Submission on Haiti's Justice Sector (July 2026) by the Coalition of Haitian and Solidarity Human Rights Organizations to the UN Human Rights Council for Haiti's Universal Periodic Review*, ¶ 30 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Justice-Sector-by-HaitiHumanRightsCoalition-EN-w-cover.pdf ("According to *Chans Altenativ*, authorities facilitated rape of detainees perceived to be gay at the Port-au-Prince Penitentiary.").

[278] Local human rights organizations note the complete absence of legal protections for LGBTQI+ individuals, who face additional barriers to justice due to judicial bias and stigmatization. (Notes on file with authors). *See also* Betty Alvarez, *LGBTQ+ Persecution in Haiti: Social Hostility, Threats, and the Absence of Legal Protection*, Human Rights Experts (Jul. 15, 2026), https://thehuman-rights.com/haiti-lgbt-persecution-social-hostility-absence-legal-protection/ (observing that while LGBTQI+ lifestyles are not criminalized, there is a "near-complete absence of legal protection," with police "unresponsive to LGBT-targeted violence" and instead reportedly complicit in violence against LGBTQI+ persons).

[279] *See, e.g.* GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/; POHDH, *BILAN SEMESTRIEL 2026: Crise de gouvernance renforcée et détérioration des conditions socioéconomiques, la POHDH dresse le bilan des six premiers mois de l'année 2026*, p. 17, 19 (Jul. 30, 2026), https://pohdh-ht.org/media/documents/BILAN_SEMESTRIEL_POHDH_juillet_2026.pdf (reporting on armed groups seizing farmers' land, demanding exorbitant ransoms to allow for movement of produce, burning crops); Sam Vigersky, *On the Ground in Haiti: The*

Growing War Zone Facing U.S. Deportees, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportee; *see further* note 327.

[280] GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ (reporting that "security efforts have remained focused almost entirely on Port-au-Prince, while gang violence has increasingly become rural and centrifugal, extending far beyond the capital," and opining that the government needs a political and security strategy that includes "protection and support for farmers"). Instead there is evidence that state actors, including the police, may be involved in illegal land grabs. *See* note 144.

[281] Tirana Hassan, *The Crisis I Witnessed in Haiti*, TIME (Jun. 26, 2026), https://time.com/article/2026/06/25/the-crisis-i-witnessed-in-haiti/; *see also* Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html ("[O]ne of the world's most severe humanitarian crises. . . . William O'Neill, the United Nations' independent expert on human rights in Haiti. . . . [said] access to food, water, shelter and medical care is severely limited.") (*internal quotations omitted*); Juhakenson Blaise, *Dominican Republic rules out troop deployment to Haiti's anti-gang force*, Haitian Times (Jul. 15, 2026), https://haitiantimes.com/2026/07/15/dominican-republic-humanitarian-not-operational-haiti-force/ ("[A]bout 6.4 million require humanitarian assistance."); Germina Pierre Louis, *Artibonite : le département suffoque, les groupes armés gagnent du terrain* (Le Nouvelliste (May 5, 2026), https://lenouvelliste.com/article/266977/artibonite-le-departement-suffoque-les-groupes-armes-gagnent-du-terrain ("The humanitarian situation is alarming."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 14 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("The already dire humanitarian situation – including limited access to food, water, health care, housing and education – remains critical due to both conjunctural and structural challenges, including pervasive gang violence and the absence of effective state governance and accountability. This impedes the enjoyment of economic, social and cultural rights."); Thomas Lalime, *A Decade Without Elections, Seven Years of Economic Decline*, Le Nouvelliste (Mar. 30, 2026), https://lenouvelliste.com/en/article/265767/a-decade-without-elections-seven-years-of-economic-decline (describing generally the insecurity and humanitarian crisis and its roots in Haiti's long-standing governance issues: "The political crisis and the economic depression feed off each other, plunging the country into a multidimensional crisis that affects institutions, governance, and severely deteriorates the population's living conditions.").

[282] Haiti Libre, *Haiti - Environment : The climate injustice facing Haiti* (Aug. 13, 2026), https://www.haitilibre.com/en/news-48205-haiti-environment-the-climate-injustice-facing-haiti.html (describing Haiti as "among the countries hardest hit by the climate crisis," with "more destructive hurricanes, [leading to] floods, droughts, agricultural losses, and considerable economic damage"); Le Nouvelliste, *Saison cyclonique 2026 : la Protection civile renforce ses actions de prévention* (Jun. 10, 2026), https://lenouvelliste.com/article/268173/saison-cyclonique-2026-la-protection-civile-renforce-ses-actions-de-prevention; IOM, *Haiti's Displacement Crisis Hits Record 1.5 Million Amid Escalating Violence* (Jun. 5, 2026), https://www.iom.int/news/haitis-displacement-crisis-hits-record-15-million-amid-escalating-violence ("With the Atlantic hurricane season now underway, humanitarian concerns are mounting. Flooding and severe weather could further worsen already fragile living conditions, particularly in overcrowded displacement sites where many people lack adequate shelter and access to basic services."); Jacqueline Charles, *Dangerously overcrowded boat with 240 Haitians intercepted near Turks & Caicos*, Miami Herald (Jun. 5, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316018833.html ("Flooding and severe weather threatens already fragile living conditions, particularly in overcrowded displacement sites where people already report critical shortages of shelter, food, clean water, healthcare and social support."); Gérard Maxineau, *Cap-Haïtien Caught Between Government Promises and Ongoing Challenges*, Le Nouvelliste (May 5, 2026), https://lenouvelliste.com/en/article/266999/cap-haitien-caught-between-government-promises-and-ongoing-challenges (flooding in Cap-Haïtien exacerbated long-standing issues with sanitation in the city); Jacqueline Charles, *Hunger persists across Haiti where floods, armed attacks, high fuel costs threaten gains*, Miami Herald (Apr. 20, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article315440903.html ("Haiti is still recovering from last year's Hurricane Melissa, which caused torrential rain, flooding, landslides and destruction across the southern and west regions of the country."); IPC, *Haiti: Acute Food Security Situation Projection Update for March - June 2026* (Apr. 16, 2026), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Haiti_Acute_Food_Insecurity_Projection_Update_Mar_Jun2026_Snapshot.pdf ("Households remain deeply affected by repeated climatic shocks, including recurrent drought and the impact of Hurricane Melissa, which struck the south in October 2025."); Associated Press, *Heavy rains in northwestern Haiti kill 12 people and damage hundreds of homes*, Washington Post (Apr. 14, 2026), https://www.washingtonpost.com/business/2026/04/14/haiti-flooding-northwest-destroyed-rains/693a556a-3835-11f1-90c4-9772c7fabc03_story.html (heavy rains killed at least 12 people, flooded farmland, destroyed crops, and damaged key infrastructure and hundreds of homes in northwest Haiti in April 2026; the floods also prevented authorities from accessing impacted communities that needed urgent humanitarian assistance, and forced the closure of schools and businesses); Marion Bethel, *International Women' Day: Support for Haiti must focus on the security of women*, Miami Herald (Mar. 6, 2026), https://www.miamiherald.com/opinion/op-ed/article314950721.html ("Haiti's vulnerability to climate change is extreme due to its geographic location, deforestation and soil degradation, factors aggravated by high poverty rates and political instability. These effects manifest in natural disasters and displacements affecting more than 1.4 million people, while 5.7 million face acute hunger."); *see also* Alterpresse, *Haïti parmi les pays où les enfants sont fortement exposés auux tempêtes tropicales, selon l'Unicef* (Jun. 23, 2026), https://www.alterpresse.org/Haiti-parmi-les-pays-ou-les-enfants-sont-fortement-exposes-aux-tempetes-tropicales-selon-l-Unicef ("Haiti is among the countries where almost all children are exposed to tropical storms.").

[283] UN, *UNGA update, Nuclear Weapons, Ukraine/Russia & other topics - Daily Press Briefing*, 7:20 (Sep. 29, 2026), https://webtv.un.org/en/asset/k11/k11o5mrox5 (UN spokesperson Stéphane Dujarric noted that displaced persons are "exposed to flooding, landslides, and severe weather," and that insecurity and funding shortfalls hamper efforts to improve "early warning, contingency planning, and prepositioning of essential supplies to be ready" before hurricane season); Haiti Libre, *Haïti - Environnement : Financement climatique en Haïti* (Sep. 6, 2026), https://ftp.haitilibre.com/article-48383-haiti-environnement-financement-climatique-en-haiti.html (during a meeting to discuss climate finance, Minister of the Environment Valéry Fils-Aimé

"highlighted the gap between the scale of the environmental and climate challenges facing the country and the financial resources currently being mobilized"); IMF, *Haiti, Third review under the staff-monitored program and request for extension—press release; and staff report*, p. 19 (May 2026), https://www.imf.org/-/media/files/publications/cr/2026/english/1htiea2026001.pdf ("The response to Hurricane Melissa [in 2025] underscored operational bottlenecks—e.g., delays in deploying budgeted assistance and in completing damage and needs assessments."); IRC, *2026 Emergency Watchlist*, p. 45 (Dec. 16, 2025), https://www.rescue.org/sites/default/files/2025-12/Watchlist26-Report.pdf ("Haiti is highly vulnerable to earthquakes, floods and storms, and even one major shock could push millions more into catastrophe at a time when aid capacity is at its lowest."); *but see* Haiti Libre, *Restoring ecosystems to strengthen climate resilience in Haiti* (Jul. 22, 2026), https://www.haitilibre.com/en/news-48044-restoring-ecosystems-to-strengthen-climate-resilience-in-haiti.html (reporting on the launch of an initiative by the Haitian ministries and the UN on "Strengthening Resilience to Climate Disasters in Southern Haiti," which aims to "strengthen the adaptive capacity of 115,974 people living in the fragile ecosystems of Grand'Anse and Nippes over a 48-month period"); Lenz Beth Ferlyn Alparète, *Le MEF mise sur la résilience climatique et le développement territorial pour relancer l'économie haïtienne*, Juno7 (Jul. 1, 2026), https://www.juno7.ht/mef-relance-economique-resilience-climatique-haiti/ (the Ministry of Economy and Finance presented two plans aimed at strengthening Haiti's resilience to climate change, which a proponent says "offer Haiti an opportunity to break with the cycle of crises by focusing on structural investments, inclusive growth and better adaptation to climate challenges").

[284] Victor Raison, *Guns, gangs, and drought: how crime and the climate crisis are reshaping Haiti*, The Guardian (Nov. 13, 2025), https://www.theguardian.com/global-development/2025/nov/13/haiti-violence-climate-disaster-drought-haitians-gang-warfare; Milo Milfort, *A Proposed Dominican Gold Mine Alarms Haitians near the Border about a "Disaster," but the De Facto Haitian State Ignores Them*, Haïti Liberté (Jun. 17, 2026), https://haitiliberte.com/a-proposed-dominican-gold-mine-alarms-haitians-near-the-border-about-a-disaster-but-the-de-facto-haitian-state-ignores-them/ (a planned gold mine by a Canadian company in a Dominican town near the Haiti-Dominican border could have "devastating consequences and irreversible impacts" on both countries) (*internal quotations omitted*); NYU School of Law Global Justice Clinic, *Haiti's New Mining Law*, pp. 1-2 (May 2026), https://static1.squarespace.com/static/5fc7ae09382bec7399f8fb0c/t/6a1857ab3292d52abd67bcfe/1779980204419/Preliminary+Draft_Analysis+of+2026+Mining+Decree_Global+Justice+Clinic.docx.pdf (a new law governing mineral mining in Haiti, set to go into effect in September 2026, "fail[s] to protect Haiti's fragile environment, leave[s] Haitian communities vulnerable to expropriation and rights violations, violate[s] Haiti's Constitution, and promote[s] corporate and government secrecy over transparency of information in the public interest," and also risks becoming another source of illicit income for armed groups).

[285] In particular, restitution for the debt extorted by France in 1825 in exchange for Haiti's independence, which has played a significant role in Haiti's under-development. Victor Raison, *Guns, gangs, and drought: how crime and the climate crisis are reshaping Haiti*, The Guardian (Nov. 13, 2025), https://www.theguardian.com/global-development/2025/nov/13/haiti-violence-climate-disaster-drought-haitians-gang-warfare (the ransom "has left a legacy of environmental degradation, violent upheavals and weak governance"); IJDH, *Joint Open Letter to Demand Restitution for Haiti's Independence Ransom from France* (Jul. 11, 2025), https://www.ijdh.org/2025/07/projects/joint-open-letter-to-demand-restitution-for-haitis-independence-ransom-from-france/; Brian Concannon Jr., Kristina Fried & Sasha Filippova, *Restitution for Haiti, Reparations for All: Haiti's Place in the Global Reparations Movement*, University of Miami Inter-American Law Review (Dec. 13, 2023), https://repository.law.miami.edu/cgi/viewcontent.cgi?article=2673&context=umialr; *see also* UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 45 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("As highlighted in previous reports, the violence in Haiti is intrinsically linked to economic, social and cultural inequalities. Prevention and protection policies should include community-based processes to restore social cohesion and include support for reduction of community-based violence, disarmament, demobilisation, recovery and reintegration efforts."); GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence*, (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ (emphasizing the importance of "protection and support for farmers" as part of any political and security strategy in the Kenscoff and Artibonite regions).

[286] World Bank, *Haiti*, https://www.worldbank.org/ext/en/country/haiti#tab-economy (last visited Oct. 20, 2026); Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html; *see also* Thomas Lalime, *A Decade Without Elections, Seven Years of Economic Decline*, Le Nouvelliste (Mar. 30, 2026), https://lenouvelliste.com/en/article/265767/a-decade-without-elections-seven-years-of-economic-decline ("[T]here has been a continuous contraction of the national economy over the past seven years. This amounts to a true economic depression with staggering social repercussions.").

[287] World Bank, *Haiti*, https://www.worldbank.org/ext/en/country/haiti#tab-economy (last visited Oct. 20, 2026) ("An estimated 50.8 percent of Haitians live on less than US$3.00 a day."); Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html (the World Bank estimates that 49% of Haitians are living on less than US$3.00 per day). The international poverty line is set at $3.00 per person per day for meeting one's basic needs. *See* Deon Filmer et al., *Further strengthening how we measure global poverty*, World Bank (Jun. 5, 2025), https://blogs.worldbank.org/en/voices/further-strengthening-how-we-measure-global-poverty. *See also* FEWS, *Haiti - Food Security Outlook Update*, p. 2 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print ("Poor household incomes remain below average, both in nominal terms and due to the high prices of goods and services.").

[288] Institut Haïtien de Statistique et d'Informatique, *Indice des Prix à la Consommation (IPC)*, https://ihsi.gouv.ht/statistiques/statistiques_economiques/ipc (last visited Oct. 11, 2026); Trading Economics, *Haiti Inflation Rate*, https://tradingeconomics.com/haiti/inflation-cpi (last visited Oct. 20, 2026) (although reporting that inflation dropped below 20% for the first time since October 2021); *see also* Lenz Beth Ferlyn Alparète, *Inflation : la BRH enregistre une hausse des prix de 21% en avril 2026*, Juno7 (Jun. 24, 2026), https://www.juno7.ht/inflation-brh-hausse-prix-avril-2026/ (noting that the Bank of the Republic of Haiti attributes the ups and downs in inflation during the spring "mainly to the revision of petroleum product prices

which came into effect on April 2, 2026"); FAO & WFP, *Hunger Hotspots, FAO-WFP early warnings on acute food insecurity, June to November 2026 outlook*, p. 29 (Jun. 2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/ ("Despite the recent deceleration, the annual food inflation rate stood at 24 percent in February 2026, continuing to limit vulnerable households' access to food, while headline inflation is forecast at 23.5 percent in 2026."); Edxon Francisque, *Haiti textile workers reject government's modest pay raise, maintain strike*, Haitian Times (May 8, 2026) https://haitiantimes.com/2026/05/08/haiti-textile-workers-striking/ ("Inflation has remained persistently high in recent years, sharply reducing purchasing power for low-income workers, while the gourde has continued to lose value against the U.S. dollar.").

[289] Institut Haïtien de Statistique et d'Informatique, *Indice des Prix à la Consommation (IPC)*, https://ihsi.gouv.ht/statistiques/statistiques_economiques/ipc (last visited Oct. 11, 2026) (as of August 2026, the price of basic foodstuffs is still inflated, with rice at 20.5%, maize at 16.4% meat at 24.6%, fresh fish at 23.9%, herring at 19.3%, edible oil at 15.7%, bananas at 16.7%, peas at 20.5%, fabrics at 19.8%, charcoal at 25.3%, kerosene at 25.8%, and gasoline and diesel at 26.3%); Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ (according to anthropologist Dr. Greg Beckett, "even obtaining a bag of rice was so dangerous and so expensive that Haitian friends of his in Canada asked someone flying down from Miami to pack rice into their bags to give out to their family in Haiti."); FAO & WFP, *Hunger Hotspots, FAO-WFP early warnings on acute food insecurity, June to November 2026 outlook*, p. 8 (Jun. 2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/ ("Haiti's economy is forecast to contract for the eighth consecutive year in 2026, while a high food inflation rate (24 percent in February 2026) is compressing household purchasing power."); Evens Sanon & Dánica Coto, *Haitians cut back on already scarce food and ask how they'll survive rising fuel prices*, Associated Press (Apr. 12, 2026), https://www.ap.org/news-highlights/spotlights/2026/haitians-cut-back-on-already-scarce-food-and-ask-how-theyll-survive-rising-fuel-prices/ ("For a factory worker in Haiti, the war in distant Iran means he now has to walk two hours to work and the same distance home each day, because he can no longer afford public transportation."); *cf.* FEWS, *Haiti - Food Security Outlook Update*, p. 2 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print ("Poor household incomes remain below average, both in nominal terms and due to the high prices of goods and services."); Edxon Francisque, *Haiti textile workers reject government's modest pay raise, maintain strike*, Haitian Times (May 8, 2026) https://haitiantimes.com/2026/05/08/haiti-textile-workers-striking/ (many workers "spend a substantial portion of their daily earnings commuting to factories or buying basic necessities").

[290] Edxon Francisque, *Haiti textile workers reject government's modest pay raise, maintain strike*, Haitian Times (May 8, 2026) https://haitiantimes.com/2026/05/08/haiti-textile-workers-striking/ (related strikes in the textile industry are causing a ripple effect on the economy as small merchants and motorcycle taxi drivers who serve the factory workers report losses in income: "The slowdown is affecting thousands of livelihoods tied to the industrial park operations."); Esther Kimberly Bazile, *Unions Call for 3,000 Gourdes Minimum Wage Amid Workers' Strike*, Le Nouvelliste (Apr. 15, 2026), https://lenouvelliste.com/en/article/266327/unions-call-for-3000-gourdes-minimum-wage-amid-workers-strike ("The official minimum wage, set at 600 gourdes per day for more than five years, is now considered largely insufficient to meet basic needs.").

[291] IRC, *Families in Haiti Face Impossible Choices as Violence Surges and Public Services Collapse, IRC Finds* (Apr. 16, 2026), https://www.rescue.org/press-release/families-haiti-face-impossible-choices-violence-surges-and-public-services-collapse (Emergency Country Director for IRC Haiti Alice Ribes: "Even public services that remain available are largely inaccessible either due to costs–with nearly 50% of the population surviving on less than $3 a day–or serious safety concerns, especially for women and children. Most people's primary mode of transport is walking. This makes them vulnerable to extortion, kidnapping, forced gang recruitment, and physical harm along the way."); Edxon Francisque, *Haiti textile workers reject government's modest pay raise, maintain strike*, Haitian Times (May 8, 2026) https://haitiantimes.com/2026/05/08/haiti-textile-workers-striking/ ("Fuel prices and transportation costs have become central grievances for workers, many of whom spend a substantial portion of their daily earnings commuting to factories or buying basic necessities.").

[292] *See* Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees (a displaced woman "explained how she has taken on debt to buy food," using WFP cash assistance to first pay back the money she already owes and the leftovers to "buy uncooked spaghetti and rice"); UN News, *Haiti's freefall demands urgent global action as millions face hunger and violence* (Apr. 10, 2026), https://news.un.org/en/story/2026/04/1167283 (reporting "families skipping meals and children even leaving school to help support their households").

[293] Kensley Blaise, Jean Marie Cayemitte & Jean Gardy Victor, *Chocs de transferts et vulnérabilité macrofinancière en Haïti: les risques liés au TPS?*, Direction Recherche en Economie et Finance (DREF) & Banque de la République d'Haïti (BRH), pp. 5, 27 (Sep. 23, 2026), https://www.haitilibre.com/docs/Presentation-DREF-BRH_Transferts_et_TPS_Mercredi-de-la-BID_23-09-2026.pdf ("Haitian migrants in the United States account for about 80% of the remittances received by Haiti. . . . Even a moderate shock to remittances has measurable, multi-channel effects on the Haitian economy."); Marty Schladen, *'Not a safe place.' Aid worker describes conditions in Haiti as Ohioans are forced to return*, News From The States (Aug. 11, 2026), https://www.newsfromthestates.com/article/not-safe-place-aid-worker-describes-conditions-haiti-ohioans-are-forced-return; Maye Primera, *'Nobody should be forced to return to Haiti': UN expert warns the island is unfit to receive deportees*, El País (Aug. 9, 2026), https://english.elpais.com/usa/2026-08-09/nobody-should-be-forced-to-return-to-haiti-un-expert-warns-the-island-is-unfit-to-receive-deportees.html ("Families survive on remittances sent by relatives abroad: billions of dollars that pay rent, healthcare, schools, funerals, taxes for a weakened state and the fees demanded by the gangs."); Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html ("The new Supreme Court decision is posed to further threaten conditions, cutting off the pipeline of remittances that were a lifeline to many Haitians on the island. . . . especially given that Haitians, the majority of whom live in the United States, transferred more than $4 billion home in [2024] through formal channels, according to the country's central bank."); FAO & WFP, *Hunger Hotspots, FAO-WFP early warnings on acute food insecurity, June to November 2026 outlook*, pp. 8, 29 (Jun. 2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/; *see also* UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 54, UN Doc. S/2026/241 (Mar. 27, 2026),

https://docs.un.org/en/S/2026/241 ("Most Haitian households receive remittances from their kin in the diaspora, with more than 70% coming from the United States, largely through these digital platforms, and this helps communities and households to cope, in addition to being an important source of capital for economic growth.").

[294] Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html (the International Monetary Fund attributed Haiti's economic "decline to the persistent and intensifying gang violence, ongoing political instability, infrastructure challenges and rising fuel prices linked to the conflict in the Middle East"); *see also* Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("Once the wealthiest colony in the Western Hemisphere, the ongoing legacy of colonial extraction has made Haiti the poorest country in the region.").

[295] *See, e.g.*, Jérôme Wendy Norestyl, *Krisla imposed unlawful housing tax in Carrefour*, AyiboPost (Aug. 9, 2026), https://ayibopost.com/krisla-imposes-a-tax-on-homes-in-carrefour/ (the armed group in control of Carrefour, Port-au-Prince's second largest commune, is imposing "housing taxes" of anywhere between 5,000 and 200,000 gourdes per homeowner; it also "asks schools for a 'voluntary offering'" and extorts fees for everyday activities like riding a motorcycle with a suitcase and completing a money transfer; at the beginning of 2026 it shut down a church for three weeks because it had not paid).

[296] Frances Robles, *Deported From the U.S., Some Haitians Are Left Broke and Stranded*, New York Times (Sep. 6, 2026), https://www.nytimes.com/2026/09/06/world/americas/haiti-deportees.html ("The road out of Cap Haitien, on Haiti's northern coast, is controlled by gangs that extract tolls from drivers and kidnap travelers."); UN, *Kenscoff Massacre Exposes Worsening Brutality of Haiti's Gang Crisis, Security Council Hears, as Speakers Urge Rapid International Support* (Aug. 28, 2026), https://press.un.org/en/2026/sc16444.doc.htm (during a UNSC meeting on Haiti, Brazil's delegate noted that "Haiti's security crisis is increasingly characterized by criminal economies, sustained through the control of strategic logistical nodes and extortion revenues"); BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 19 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 ("The persistence of illegal checkpoints established by gangs along strategic roads in the West and Artibonite departments, particularly on National Roads 1 and 2, continues to restrict freedom of movement, disrupt economic activities, and hinder the population's access to essential goods and services."); BINUH, *Flash Report - Intensification of Gang Violence in the Plaine du Cul-de-Sac Area and Cité Soleil (March - July 2026)*, pp. 21-22 (Aug. 6, 2026), https://binuh.unmissions.org/en/document-library/flash-report-intensification-of-gang-violence-in-the-plaine-du-cul-de-sac-1 (discussing armed group' "criminal economy based primarily on the extortion of economic operators, the collection of illegal taxes on commercial activities, and the control of certain transport and supply routes" in the Plaine du Cul-de-Sac); FEWS, *Haiti - Food Security Outlook Update*, p. 2 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print (discussing "[t]he entrenchment of a conflict economy" that reinforces "constraints on market access and livelihoods"); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 22-23, 53, 57, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("[Armed groups] camouflage themselves in Haitian National Police regalia and conduct 'operations' aimed at extorting the public, including kidnapping for ransom and maintaining 'concealed' checkpoints. . . . The apparent 'reduced' visibility of gang activities does not necessarily mean that they are less operational in terms of revenue collection."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶¶ 14-15 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("Gangs continued to destroy and ransack public and private property, extort money from businesses, and demand payments from private and public vehicles at numerous illegal checkpoints established along main roads in the capital and manned by heavily armed gang members."); *see also* Wolf Pamphile, *400 Mawozo Gang and the $648 Million Trade Routes That Could Disrupt Haiti's Elections*, Haiti Policy House (Sep. 23, 2026), https://www.haitipolicyhouse.org/publications/400-election-trade (discussing armed groups' control over the lucrative trade routes linking Haiti to the Dominican Republic).

[297] UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 53-54, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 (despite the growing trend in digital money transfer, "the remittance sector has become a major target for gangs because it is one of the few functioning financial lifelines in the country").

[298] Kervenson Martial, *Residents question quality of Haiti's Northwest new road project, call for paved highway*, Haitian Times (Jul. 31, 2026), https://haitiantimes.com/2026/07/31/residents-question-quality-of-haitis-northwest-new-road-project-call-for-paved-highway/ (a road project to address "one of the Northwest's most urgent infrastructure needs" – the Jean-Rabel–Port-de-Paix corridor, which "is considered vital to the Northwest's economy because it links agricultural communities with the departmental capital" – has been criticized for focusing on a compacted dirt roadway rather than a fully paved highway, leaving large sections of the road virtually impassable during the rainy season, isolating communities, disrupting trade, and limiting access to public services); Jean Junior Celestin, *L'état des routes autour de l'aéroport pèse sur l'activité économique, le secteur privé interpelle le gouvernement*, Le Nouvelliste (May 4, 2026), https://lenouvelliste.com/article/266946/letat-des-routes-autour-de-laeroport-pese-sur-lactivite-economique-le-secteur-prive-interpelle-le-gouvernement (companies in the Cul-de-Sac plain denounce "the dilapidated state of the roads adjoining Toussaint Louverture International Airport, between National Route No. 1 and Route No. 9," which they say are "in a state of critical disrepair, and . . . no longer allow[] for normal operation under minimum safety conditions," compromising "the continuity of economic activities; thousands of direct and indirect jobs; access to essential services; distribution, production and supply chains; and the very coherence of the efforts undertaken to secure the airport").

[299] Jude Pierre Louis, *'We cannot take it anymore': Haiti's informal vendors protest over gang warfare*, Global Voices (Sep. 27, 2026), https://globalvoices.org/2026/09/27/we-cannot-take-it-anymore-haitis-informal-vendors-protest-over-gang-warfare/ ("Gangs have burned down public markets and destroyed both businesses and inventory. Violence has turned regular trading spots into dangerous areas trapped in constant gunfire, driving vendors away."); BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 18 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 ("Gang violence . . . led to the suspension of most commercial activities and basic services in certain areas. For example, during the clashes in the Plaine du Cul-de-Sac and Cité Soleil, transportation was paralyzed.

. . . Business leaders operating in the area also issued several statements and engaged in discussions with national and international actors to raise awareness of the risks to their economic and logistical activities."); BINUH, *Flash Report: Haiti—Gang Violence: 613 Killed and 375 Injured in the Plaine du Cul-de-Sac and Cité Soleil Between March and July 2026*, p. 3 (Aug. 6, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Flash%20Report%20-%20Intensification%20of%20Gang%20Violence%20in%20the%20Plaine%20du%20Cul-de-Sac%20Area%20and%20Cit%C3%A9%20Soleil%20%28March%20-%20July%202026%29_1.pdf (documenting attacks on public and private buildings by armed groups in Cul-de-Sac and Cité Soleil and "the suspension of most commercial activities and basic services in the neighborhoods affected by the violence"); FAO & WFP, *Hunger Hotspots, FAO-WFP early warnings on acute food insecurity, June to November 2026 outlook*, p. 5 (Jun. 2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/ ("The expansion of gang violence into previously less-affected districts in Haiti is . . . severely constraining humanitarian access . . . and livelihoods."); Wesker Sylvain, *Les mangues pourrissent en Haïti, faute d'exportations*, AyiboPost (Jul. 22, 2026), https://ayibopost.com/les-mangues-pourrissent-en-haiti-faute-dexportations/ (discussing the enduring impacts of the United States' 2023 suspension of mango imports from Haiti, which accounted for US$7-10 million in annual revenue and constituted one of the main sources of agricultural income in Haiti); AlterPresse, *Haïti – Le gouvernement révise à la baisse les tarifs du transport en commun après la diminution des prix des carburants* (Jul. 14, 2026), https://www.alterpresse.org/Haiti-Le-gouvernement-revise-a-la-baisse-les-tarifs-du-transport-en-commun-apres-la-diminution-des-prix-des-carburants (government-mandated fare reductions for public transportation to reflect a decrease in the price of petroleum products "do not apply to motorcycle journeys, which have nevertheless become one of the main means of transport across the entire national territory," and raise questions around enforcement "in areas controlled by armed gangs, where extortions against drivers contributes to an artificial increase in transportation costs"); Gaëlle Timmer, *Danielle Saint-Lot works to expand global markets for Haitian artists*, Haitian Times (Jun. 8, 2026), https://haitiantimes.com/2026/06/08/danielle-saint-lot-haitian-artisans-profile/ ("The crafts industry of Haiti once generated almost $25 million in exports during the 1980s. Today, that number has come down below $1 million following two decades of political instability, the aftermath of the embargo during the 1990s, and continuing gang-related blockades that have cut off artisans from Port-au-Prince and the Labadee cruise port."); FEWS, *Haiti - Food Security Outlook Update*, p. 1 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print; Jacqueline Charles, *Fresh gang attacks frustrate Haiti businesses, hit charity hospital as residents flee*, Miami Herald (May 13, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article315715026.html ("[I]ntense fighting between several rival armed groups in the neighborhoods of Cité Soleil and Croix des Bouquets has deepened frustrations among business owners, who spent Monday trying to account for missing employees. . . . For weeks now, businesses operating near the airport and in the Cul-de-Sac Plain, where cane fields belonging to the Rhum Barbancourt distillery were recently set ablaze, have been sounding the alarm. . . . We're talking about thousands of jobs, hundreds of thousands of indirect jobs.") (*internal quotations omitted*); Edxon Francisque, *Haiti textile workers reject government's modest pay raise, maintain strike*, Haitian Times (May 8, 2026) https://haitiantimes.com/2026/05/08/haiti-textile-workers-striking/ ("The textile sector remains one of Haiti's last major formal industries[,]. . . . generates hundreds of millions of dollars annually in exports, . . . and supports tens of thousands of jobs directly and indirectly. . . . [D]espite the extension of the [U.S.] trade preference programs, boosting investors' confidence, industry advocates warn that Haiti's apparel sector could collapse under struggles over minimum wage increase, mounting insecurity and transportation costs. The crisis exposes the fragility of Haiti's export-led assembly model, which depends heavily on low-wage labor and preferential U.S. market access while operating in an environment plagued by gang violence, political instability and crumbling infrastructure."); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, p. 7 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026; Jean Junior Celestin, *L'état des routes autour de l'aéroport pèse sur l'activité économique, le secteur privé interpelle le gouvernement*, Le Nouvelliste (May 4, 2026), https://lenouvelliste.com/article/266946/letat-des-routes-autour-de-laeroport-pese-sur-lactivite-economique-le-secteur-prive-interpelle-le-gouvernement (according to the Association of Industries in Haiti, escalating insecurity in the Port-au-Prince metropolitan area and the Artibonite and Center Departments "is now paralyzing vital sectors: road blockages, disruption of the flow of goods and services, halt to strategic rice production in Artibonite, disruption of access to energy in Péligre," with "the national economy . . . at a standstill"); IPC, *Haiti: Acute Food Security Situation Projection Update for March - June 2026* (Apr. 16, 2026), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Haiti_Acute_Food_Insecurity_Projection_Update_Mar_Jun2026_Snapshot.pdf; *see also* Haiti Libre, *Haiti - Crisis: Haiti faces the collapse of its agriculture* (Sep. 5, 2026), https://ftp.haitilibre.com/article-48376-haiti-crise-haiti-face-a-l-effondrement-de-son-agriculture.html (insecurity is impacting "[t]he cattle, goat, sheep, pig, and poultry sectors," which "is particularly worrying because livestock farming represents a significant economic asset for rural families. . . . enabling them to finance children's schooling, healthcare, agricultural investments, and even cope with emergencies"); Alterpresse, *Haïti-Crise : Une rentrée scolaire 2026 menacée par l'absence de dispositions étatiques, alerte l'Upeph* (Aug. 31, 2026), https://www.alterpresse.org/Haiti-Crise-Une-rentree-scolaire-2026-menacee-par-l-absence-de-dispositions-etatiques-alerte-l-Upeph (insecurity-related school closures have caused "hundreds of teachers" to be unemployed); Thomas Lalime, *A Decade Without Elections, Seven Years of Economic Decline*, Le Nouvelliste (Mar. 30, 2026), https://lenouvelliste.com/en/article/265767/a-decade-without-elections-seven-years-of-economic-decline ("In such a context [of economic decline], businesses hesitate to invest, development projects are delayed or abandoned, and investment flows—both domestic and foreign—become scarce. The formal economy contracts while informal and illicit activities expand."); Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html ("While a preferential trade access program for apparel exports to the U.S. had been retroactively extended to the end of this year after lapsing, a longer-term agreement to support investment and job creation still had not been secured, adding to the fiscal pressures.").

[300] Roberson Alphonse, *Terminal Varreux toujours fermé, des files d'attente observées dans des stations d'essence*, Le Nouvelliste (Jun. 17, 2026), https://lenouvelliste.com/article/268549/terminal-varreux-toujours-ferme-des-files-dattente-observees-dans-des-stations-dessence (reporting that the Varreux fuel terminal was forced to closed for four days in June and that queues were appearing at fuel stations).

[301] On March 27, 2026, the transitional government published a Decree Determining the Procedures for Setting Petroleum Product Prices, which determined that petroleum prices would be calculated and set monthly by the Ministries of Economy and

Finance and Commerce and Industry. The result has been a fluctuation in fuel prices, with an overall increase since the beginning of April. Haiti Libre, *Haïti - FLASH : Modalité de fixation des prix des produits pétroliers* (Mar. 31, 2026), https://www.haitilibre.com/article-47185-haiti-flash-modalite-de-fixation-des-prix-des-produits-petroliers.html; Jean Junior Celestin, *Fuel Prices at the Pump Reduced Again*, Le Nouvelliste (Jul. 6, 2026), https://lenouvelliste.com/en/article/269409/fuel-prices-at-the-pump-reduced-again; Institut Haïtien de Statistique et d'Informatique, *Indice des Prix à la Consommation (IPC)*, https://ihsi.gouv.ht/statistiques/statistiques_economiques/ipc (last visited Oct. 11, 2026) (reporting significant increases in prices of fuel and kerosene from July to August 2026); *see also* AlterPresse, *Haïti – Le gouvernement révise à la baisse les tarifs du transport en commun après la diminution des prix des carburants* (Jul. 14, 2026), https://www.alterpresse.org/Haiti-Le-gouvernement-revise-a-la-baisse-les-tarifs-du-transport-en-commun-apres-la-diminution-des-prix-des-carburants (according to the Haitian Association of Owners and Drivers, "the drop in fuel prices [in July] . . . [is] a step in the right direction, . . . [but] the new prices for petroleum products remain higher than those applied at the beginning of April 2026") (*internal quotations omitted*); Evens Sanon & Dánica Coto, *Haitians cut back on already scarce food and ask how they'll survive rising fuel prices*, Associated Press (Apr. 12, 2026), https://apnews.com/article/haiti-oil-prices-food-gas-transportation-iran-6ec63f1dd3a2ed106555dfe73fe383a6 ("The conflict in Iran has caused oil prices in Haiti to surge, disrupting critical supply chains, doubling transportation costs. . . . On April 2, Haiti's government announced a 37% increase in the cost of diesel and a 29% increase in the cost of gasoline."); *see also* X, Passion Info Plus, @passioninfoplus (Apr. 6, 2026), https://x.com/passioninfoplus/status/2041150585794162871?s=20 (reporting on protests following the April rise in fuel prices); MSF, *In Cité Soleil, people risk their lives to seek medical care* (Jul. 22, 2026), https://www.msf.org/haiti-people-risk-their-lives-seek-medical-care ("The recent surge in fuel prices has driven up the cost of food and transport, further entrenching the cycle of poverty for people who are vulnerable."); FAO & WFP, *Hunger Hotspots, FAO-WFP early warnings on acute food insecurity, June to November 2026 outlook*, p. 6 (Jun. 2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/ ("[T]he increase in fuel prices arising from the conflict and the resulting rise in transport fares, is likely to further strain economic activity and erode the purchasing power of the population in Haiti."); FEWS, *Haiti - Food Security Outlook Update*, p. 1 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print ("The increase has driven up transportation and distribution costs by more than 50 percent on some routes, intensifying pressure on already high food prices.").

[302] *See generally* Jude Pierre Louis, *'We cannot take it anymore': Haiti's informal vendors protest over gang warfare*, Global Voices (Sep. 27, 2026), https://globalvoices.org/2026/09/27/we-cannot-take-it-anymore-haitis-informal-vendors-protest-over-gang-warfare/.

[303] Institut Haïtien de Statistique et d'Informatique, *Indice des Prix à la Consommation (IPC)*, https://ihsi.gouv.ht/statistiques/statistiques_economiques/ipc (last visited Oct. 21, 2026) (noting that while the West Department is most impacted by the violence, inflation there is less than two percentage points higher than in other regions); IPC, *Haiti: Acute Food Security Situation Projection Update for March - June 2026* (Apr. 16, 2026), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Haiti_Acute_Food_Insecurity_Projection_Update_Mar_Jun2026_Snapshot.pdf (the most severely food insecure areas include two in the Northwest Department, the Bas-Plateau in the Center Department, the island of Gonâve, and the Belle-Anse Arrondissement in the Southeast Department, alongside displacement sites and areas more directly impacted by armed group violence in Port-au-Prince and the Artibonite Department); *see also* FEWS, *Haiti - Food Security Outlook Update*, p. 2 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print ("In urban areas, informal activities (small trade, daily labor) are heavily affected by insecurity. In rural areas, declining agricultural incomes, combined with high input costs and limited market access, are maintaining strong market dependence in a context of continuously deteriorating purchasing power and annual inflation above 20 percent.").

[304] Steve Kraske & Zach Wilson, *Kansas City convenes Haiti Symposium amid humanitarian crises and deportations*, KCUR (Sep. 10, 2026), https://www.kcur.org/podcast/up-to-date/2026-09-10/kansas-city-convenes-haiti-symposium-amid-humanitarian-crises-and-deportations (some areas "don't have enough water, and diseases are common"); MSF, *Haiti has become a far more dangerous place to live or seek medical care* (Apr. 23, 2026), https://www.doctorswithoutborders.org/latest/haiti-has-become-far-more-dangerous-place-live-or-seek-medical-care (according to the CEO of Doctors Without Borders USA, "[o]ver the last eight years, Port-au-Prince and other regions including the Artibonite and Centre departments have fallen into severe humanitarian crises, with extreme insecurity and a steep decline in essential services including water, [and] sanitation.") (*internal quotations omitted*); *see also* HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives (noting that "piped water remained severely limited" in Cap-Haïtien).

[305] LinkedIn, Haiti Outreach (May 2026), https://www.linkedin.com/posts/haiti-outreach_worldhungerday-watersecurity-haiti-activity-7465780523718565889-yBjd/; *see also* IRC, *Families in Haiti Face Impossible Choices as Violence Surges and Public Services Collapse, IRC Finds* (Apr. 16, 2026), https://www.rescue.org/press-release/families-haiti-face-impossible-choices-violence-surges-and-public-services-collapse (an IRC survey of households in the West, Artibonite, and Center Departments found that 36% of households do not treat their drinking water, exposing them to wastewater).

[306] LinkedIn, IFC – International Finance Corporation (Jul. 2026), https://www.linkedin.com/posts/ifclinkedin_only-4-in-10-people-in-rural-haiti-have-reliable-activity-7478807445478285312-zQZq/ ("Only 4 in 10 people in rural Haiti have reliable access to clean water."); Haiti Libre, *Haiti - Crisis: Haiti faces the collapse of its agriculture* (Sep. 5, 2026), https://ftp.haitilibre.com/article-48376-haiti-crise-haiti-face-a-l-effondrement-de-son-agriculture.html.

[307] BAI, *Camp Toto Report*, pp. 1, 9, 11, 13 (Jul. 2026) (on file with authors) (a visit to the Camp Toto displacement site in Delmas found that "access to water remains a major challenge," and that "[t]he site has neither a public water distribution network nor an adequate sanitation system"); Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("Residents do not have access to clean water, or waste and sanitation facilities. Living conditions are difficult and dangerous, with a high risk of waterborne diseases."); OCHA, *Haitians deserve "more than mere survival", acting deputy UN relief chief tells Security Council* (Aug. 28, 2026), https://www.unocha.org/news/haitians-deserve-more-mere-survival-acting-deputy-un-relief-chief-tells-security-council.

[308] BAI, *Camp Toto Report*, pp. 1, 11, 13 (Jul. 2026) (on file with authors) (a displaced woman reported having to pay 25 gourdes for a bucket of water, illustrating "the disproportionate financial burden that this [water] shortage places on families, particularly on female heads of household with precarious incomes"); LinkedIn, Haiti Outreach (May 2026), https://www.linkedin.com/posts/haiti-outreach_worldhungerday-watersecurity-haiti-activity-7465780523718565889-yBjd/ ("Financially, many families have to choose between buying safe water and buying food. Unfortunately, food prices are 30-77 percent higher in Haiti than in Latin America and the Caribbean as a whole. This leads to many families choosing water rather than food.").

[309] LinkedIn, Haiti Outreach (May 2026), https://www.linkedin.com/posts/haiti-outreach_worldhungerday-watersecurity-haiti-activity-7465780523718565889-yBjd/; Tirana Hassan, *The Crisis I Witnessed in Haiti*, TIME (Jun. 26, 2026), https://time.com/article/2026/06/25/the-crisis-i-witnessed-in-haiti/ (the CEO of Doctors Without Borders USA says MSF has "seen a rise in scabies linked to the lack of clean water and poor living conditions"); MSF, *Haiti has become a far more dangerous place to live or seek medical care* (Apr. 23, 2026), https://www.doctorswithoutborders.org/latest/haiti-has-become-far-more-dangerous-place-live-or-seek-medical-care ("Our mobile clinic teams have seen an increase in patients with conditions linked to the lack of clean water."); *see also* notes 357-361.

[310] 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; 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.

[311] Haiti Libre, *Haiti - Crisis: Haiti faces the collapse of its agriculture* (Sep. 5, 2026), https://ftp.haitilibre.com/en/news-48376-haiti-crisis-haiti-faces-the-collapse-of-its-agriculture.html ("Inadequate water management negatively impacts agricultural production and limits farmers' ability to irrigate their crops effectively."); LinkedIn, Haiti Outreach (May 2026), https://www.linkedin.com/posts/haiti-outreach_worldhungerday-watersecurity-haiti-activity-7465780523718565889-yBjd/ ("Those who have to drink unsafe water are more likely to contract waterborne illnesses that prevent nutritional absorption of food, worsening hunger.").

[312] *See, e.g.*, Jean Mestguer Laurin & Dethonome Jean Louis, *Weathering the Storm: Two Water Sources in Haiti, Two Outcomes*, Helvetas (Jul. 31, 2026), https://www.helvetas.org/en/switzerland/how-you-can-help/follow-us/blog/water-and-sanitation/two-water-sources-in-haiti-two-outcomes (discussing the impact of deforestation on water availability in Haiti); Sandra Wisner, *Starved for Justice: International Complicity in Systematic Violations of the Right to Food in Haiti*, Columbia Human Rights Law Review (May 10, 2022), https://hrlr.law.columbia.edu/hrlr-online/starved-for-justice-international-complicity-in-systematic-violations-of-the-right-to-food-in-haiti/; Joshua Reaves Charmelus, *Exporting Apartheid: Israel's Role in Haiti's Water Crisis*, Black Agenda Report (Apr. 29, 2026), https://www.blackagendareport.com/exporting-apartheid-israels-role-haitis-water-crisis (describing the Dominican Republic's dam project along the Massacre River – which forms a natural border between Haiti and the Dominican Republic – "as an example of 'hydro-hegemony,' heavyhanded use of force to control natural resources").

[313] Esther Kimberly Bazile, *El Niño Causes Severe Drought in Salut*, Le Nouvelliste (Sep. 9, 2026), https://lenouvelliste.com/en/article/271702/el-nino-causes-severe-drought-in-port-salut ("The existing drinking water system in the town center [in Castanby, a town in Port-Salut] does not provide a solution [to drought-related water issues]; it has broken down;" appeals by residents to authorities have gone unheeded); *see also* Jean Mestguer Laurin & Dethonome Jean Louis, *Weathering the Storm: Two Water Sources in Haiti, Two Outcomes*, Helvetas (Jul. 31, 2026), https://www.helvetas.org/en/switzerland/how-you-can-help/follow-us/blog/water-and-sanitation/two-water-sources-in-haiti-two-outcomes (comparing the resilience of two water sources impacted by October 2025's Hurricane Melissa: one received significant "protective investment" and survived the hurricane, while the other did not, resulting in "a complete breakdown of the water supply" that served around 1,500 people); Claudy Junior Pierre, *The North's Health Sector Needs Attention Before a Crisis Erupts*, Le Nouvelliste (May 13, 2026) https://lenouvelliste.com/en/article/267260/the-norths-health-sector-needs-attention-before-a-crisis-erupts (describing public health as one of several "[s]ystemic problems [in the North Department] that have persisted for years[, which] have in recent days become more visible, more serious, and therefore more urgent;" sociologist Michèle Oriol describes Cap-Haïtien as "a sanitary time bomb").

[314] Esther Kimberly Bazile, *El Niño Causes Severe Drought in Salut*, Le Nouvelliste (Sep. 9, 2026), https://lenouvelliste.com/en/article/271702/el-nino-causes-severe-drought-in-port-salut; Jean Mestguer Laurin & Dethonome Jean Louis, *Weathering the Storm: Two Water Sources in Haiti, Two Outcomes*, Helvetas (Jul. 31, 2026), https://www.helvetas.org/en/switzerland/how-you-can-help/follow-us/blog/water-and-sanitation/two-water-sources-in-haiti-two-outcomes.

[315] OCHA, *Haitians deserve "more than mere survival", acting deputy UN relief chief tells Security Council* (Aug. 28, 2026), https://www.unocha.org/news/haitians-deserve-more-mere-survival-acting-deputy-un-relief-chief-tells-security-council; Daniel Dickinson, *Haiti: Signs of hope despite gang violence and political uncertainty*, UN News (Jul. 19, 2026), https://news.un.org/en/story/2026/07/1167963.

[316] BINUH, *Quarterly Report on the Human Rights Situation in Haiti (January – March 2026)*, p. 15 (May 8, 2026),

https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (reporting that a 16-year-old girl was raped by multiple armed group members after they caught her on her way home from collecting water); Jacqueline Charles, *Fresh gang attacks frustrate Haiti businesses, hit charity hospital as residents flee*, Miami Herald (May 13, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article315715026.html (a representative of Rhum Barbancourt said that the foundation has "had to completely stop all . . . [its] services, including providing drinking water," in areas near the Cul-de-Sac Plain); ICRC, *Haiti: Escalating armed violence in Port-au-Prince cuts people off from lifesaving services* (Apr. 2, 2026), https://www.icrc.org/en/article/haiti-escalating-armed-violence-cuts-people-off-lifesaving-services (the ICRC Head of Delegation in Haiti says "[e]very movement can become a risk," even seeking water).

[317] *See* Marty Schladen, *'Not a safe place.' Aid worker describes conditions in Haiti as Ohioans are forced to return*, News From The States (Aug. 11, 2026), https://www.newsfromthestates.com/article/not-safe-place-aid-worker-describes-conditions-haiti-ohioans-are-forced-return ("'Five million people at the moment can't feed themselves,' [IRC's Deputy Director of Programs in Haiti Allie] Pasieka said. 'They aren't able to reach the volume of food the (World Health Organization) recommends for a person.'. . . While not yet technically a famine, people in Haiti are dying, said International Rescue Committee spokesperson Sylvan Foley. 'Well before we get to famine, we're already seeing people die from malnutrition, and we're already seeing that on the ground in Haiti.'"); Jacqueline Charles, *A fragile return of medical care in Haiti after weeks of violence roil capital*, Miami Herald (Jun. 5, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316008593.html (the deputy executive of the WFP said parts of Haiti "are experiencing some of the highest levels of hunger in the Western Hemisphere"); Active Learning Network for Accountability and Performance (ALNAP), *The State of the Humanitarian System*, p. 16 (Sep. 10, 2026), https://alnap.hacdn.io/media/documents/SOHS_report_interactive_5.pdf (reporting "catastrophic hunger" in Haiti).

[318] FAO & WFP, *Hunger Hotspots, FAO-WFP early warnings on acute food insecurity, June to November 2026 outlook*, p. 1 (Jun. 2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/.

[319] Integrated Food Security Phase Classification (**IPC**), *Haiti: Acute Food Security Situation Projection Update for March - June 2026* (Apr. 16, 2026), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Haiti_Acute_Food_Insecurity_Projection_Update_Mar_Jun2026_Snapshot.pdf; FAO & WFP, *Hunger Hotspots, FAO-WFP early warnings on acute food insecurity, June to November 2026 outlook*, p. 10 (Jun. 2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/ (52% of Haitians are facing acute food insecurity, putting it just behind Palestine (77%) and South Sudan (55%) and tied with Yemen in terms of percentage of population facing acute food insecurity). However, the number of Haitians facing extreme levels of starvation has decreased since last year. The IPC identifies five categories of acute food insecurity: minimal/none, stressed, crisis, emergency, and catastrophy/famine. Of the 5.83 million facing acute level food insecurity, nearly 1.9 million are facing level four "emergency" insecurity and the rest are facing level 3 "crisis" insecurity. One year ago, the number of people facing emergency insecurity was 2.1 million, and an additional 8,400 people were facing level five "catastrophy/famine" insecurity. FAO & WFP, *Hunger Hotspots, FAO-WFP early warnings on acute food insecurity, June to November 2026 outlook*, p. vii (Jun. 2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/ p. vii (the FAO and WFP downgraded Haiti from a hotspot of "highest concern" to one of "very high concern," "reflecting recent – though limited and localized – improvements mainly due to a slowdown in annual inflation, generally favourable winter agricultural conditions, and improved access along some road corridors"); IPC, *Haiti: Acute Food Security Situation Projection Update for March - June 2026* (Apr. 16, 2026), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Haiti_Acute_Food_Insecurity_Projection_Update_Mar_Jun2026_Snapshot.pdf ("[L]imited, localised improvements remain insufficient to reverse the overall trend of acute food insecurity in Haiti."); Evens Sanon & Dánica Coto, *Haitians cut back on already scarce food and ask how they'll survive rising fuel prices*, Associated Press (Apr. 12, 2026), https://apnews.com/article/haiti-oil-prices-food-gas-transportation-iran-6ec63f1dd3a2ed106555dfe73fe383a6 (according to the deputy country director for the WFP in Haiti, "[i]n recent months . . . about 200,000 people dropped from the emergency phase to the acute one, a significant milestone"); *see also* IPC, *Technical Manual Version 3.1*, p. 4 (Aug. 2021), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/manual/IPC_Technical_Manual_3_Final.pdf.

[320] UN News, *Haiti: Child malnutrition crisis worsens amid escalating violence* (Sep. 18, 2026), https://news.un.org/en/story/2026/09/1168366 (the hunger crisis "is expected to become particularly serious between December 2026 and May 2027"); Marty Schladen, *'Not a safe place.' Aid worker describes conditions in Haiti as Ohioans are forced to return*, News From The States (Aug. 11, 2026), https://www.newsfromthestates.com/article/not-safe-place-aid-worker-describes-conditions-haiti-ohioans-are-forced-return ("'Five million people at the moment can't feed themselves,' [IRC's Deputy Director of Programs in Haiti Allie] Pasieka said. . . . 'Whether that's going to come up, we don't know. But based on the indicators we're seeing, it's likely to rise further.'"); FAO & WFP, *Hunger Hotspots, FAO-WFP early warnings on acute food insecurity, June to November 2026 outlook*, p. 17 (Jun. 2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/ ("[E]levated levels of acute food insecurity are likely to persist due to expanding gang violence driving further internal displacement, which was already at record highs in December 2025."); *see also id*. at p. 1 (defining "hotspots of very high concern" as hotspots "where[, *inter alia*,] the number of people in Emergency . . . or severe food insecurity . . . is expected to increase during the outlook period, based on the latest data available, and contextual drivers are likely to further deteriorate"); OCHA, *Haiti: Nationwide Humanitarian Response Situation Report No.1 – 1 February – 31 March 2026* (Apr. 10, 2026), https://www.unocha.org/publications/report/haiti/haiti-overview-humanitarian-response-national-level-situation-report-no-1-february-march-2026 (in April, OCHA reported that the hunger crisis is "is expected to deteriorate further in the coming months, particularly as purchasing power may continue to decline following fuel price increases").

[321] *See* FEWS, *Haiti - Food Security Outlook Update*, p. 1 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print; IPC, *Haiti: Acute Food Security Situation Projection Update for March - June 2026* (Apr. 16, 2026), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Haiti_Acute_Food_Insecurity_Projection_Update_Mar_Jun2026_Snapshot.pdf (reporting that individuals in IDP camps are facing higher emergency levels of food insecurity); UN Women Haiti Country Office, *Armed Gang Violence and Displacement in Haiti: Understanding the Gender-Differentiated Impacts of the Humanitarian Crisis*, p. 10 (Apr. 2026), https://lac.unwomen.org/sites/default/files/2026-06/haiti_rga_unw_draft_003_11062026_pdf.pdf ("Displaced populations face severe food insecurity. . . . [S]cores across the surveyed population indicate inadequate and insufficiently varied food access, consistent with the IPC Phase 5 classification."); *see also* Jess Obert, *US Funding Cuts Fuel Child Recruitment Into Haiti's Armed Groups*, New Humanitarian (Aug. 19, 2026), https://pulitzercenter.org/stories/us-funding-cuts-fuel-child-recruitment-haitis-armed-groups ("People in displacement centres often face starvation.").

[322] Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees; Alexia Gardner, *Haiti is Not*

Safe: Country Conditions 2026, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("A representative from a Haitian women's organization told USCRI that people sometimes 'make a choice between eating today and getting a pack of [menstrual] pads for [their] needs.'"); FEWS, *Haiti - Food Security Outlook Update*, p. 1 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print ("These households, highly exposed to one or more forms of violence, deteriorating purchasing power, or rainfall irregularities, will continue to rely on negative coping strategies and face significant food consumption deficits."); Evens Sanon & Dánica Coto, *Haitians cut back on already scarce food and ask how they'll survive rising fuel prices*, Associated Press, https://apnews.com/article/haiti-oil-prices-food-gas-transportation-iran-6ec63f1dd3a2ed106555dfe73fe383a6 (Apr. 12, 2026) ("[M]illions of undernourished people [are forced] to cut back on already scarce meals."); UN News, *Haiti's freefall demands urgent global action as millions face hunger and violence* (Apr. 10, 2026), https://news.un.org/en/story/2026/04/1167283 (reporting "families skipping meals"); *see also* UNICEF, *Nearly one in thirteen children under five suffer from acute malnutrition in Haiti* (Aug. 28, 2026), https://www.unicef.org/press-releases/nearly-one-thirteen-children-under-five-suffer-acute-malnutrition-haiti (the UNICEF Deputy Representative in Haiti describes "a backdrop of prolonged insecurity, economic hardship and humanitarian needs that continue to constrain families' access to sufficient nutritious food, health care and nutrition services").

[323] Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ (of the 5.83 people experiencing acute food insecurity, approximately 1.2 million are children under the age of 5); *see also* UN, *Panel of Experts Report to the UN Security Council*, UN Doc. S/2026/241, p. 33 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("As of January 2026, more than 130,000 children under five were affected by acute malnutrition").

[324] WFP, *Over a quarter of a million children facing acute malnutrition in Haiti amid ongoing violence* (Sep. 17, 2026), https://www.wfp.org/news/over-quarter-million-children-facing-acute-malnutrition-haiti-amid-ongoing-violence ("An estimated 253,725 children aged 6 to 59 months in Haiti are expected to suffer from acute malnutrition between June 2026 and May 2027, including nearly 94,000 with severe acute malnutrition. . . . Severe acute malnutrition can become life-threatening without timely treatment. A further 159,852 children are expected to suffer from moderate acute malnutrition, while 25,750 pregnant and breastfeeding women will require nutritional support."); *see also* UNICEF, *Nearly one in thirteen children under five suffer from acute malnutrition in Haiti* (Aug. 28, 2026), https://www.unicef.org/press-releases/nearly-one-thirteen-children-under-five-suffer-acute-malnutrition-haiti (according to the Haitian Ministry of Public Health and Population's 2026 National Nutrition SMART Survey, "[t]he prevalence of global acute malnutrition in children in Haiti aged 6 to 59 months, defined as moderate or severe wasting or nutritional swelling, has increased from 5.1 per cent to 7.4 per cent from 2023 to 2026," with affected children "at high risk of death, particularly when combined with illness and limited access to medical care"); Ministry of Public Health and Population, *Factsheet, Haiti | Enquête nutritionnelle nationale SMART 2026* (Aug. 26, 2026), https://weshare.unicef.org/CS.aspx?VP3=SearchResult&STID=2AM40870CZ3M&_gl=&WS=SearchResults; Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("Children who are severely malnourished for extended periods of time will suffer for the rest of their lives. Their bones do not grow properly, their brains do not fully develop. Severely malnourished children are also 11 times more likely to die of key preventable diseases than well-nourished children."); *see also* IOM, *Haiti: Violence and Displacement in the Artibonite Department (Situation Report as of 17 April 2026)* (Apr. 20, 2026), https://www.unocha.org/publications/report/haiti/haiti-violence-and-displacement-artibonite-department-situation-report-17-april-2026 ("UNICEF . . . screened 1,686 children under five (866 girls and 820 boys) for wasting, identifying and treating 30 cases of severe acute malnutrition."); OCHA, *Haiti: Nationwide Humanitarian Response Situation Report No.1 – 1 February – 31 March 2026* (Apr. 10, 2026), https://www.unocha.org/publications/report/haiti/haiti-overview-humanitarian-response-national-level-situation-report-no-1-february-march-2026 ("Children, as well as women and girls, are among the most vulnerable, facing heightened risks of . . . malnutrition.").

[325] Haitian Ministry of Public Health and Population & IPC, *HAITI: Aperçu de la malnutrition aiguë de l'IPC, Juin 2026 - Mai 2027* (Sep. 11, 2026), https://reliefweb.int/report/haiti/haiti-apercu-de-la-malnutrition-aigue-de-lipc-juin-2026-mai-2027-11-septembre-2026 (estimating 93,873 children).

[326] Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees ("In a nation already plagued by hunger, the gangs have turned food into a weapon of war."); UNICEF, *Nearly one in thirteen children under five suffer from acute malnutrition in Haiti* (Aug. 28, 2026), https://www.unicef.org/press-releases/nearly-one-thirteen-children-under-five-suffer-acute-malnutrition-haiti; FAO & WFP, *Hunger Hotspots, FAO-WFP early warnings on acute food insecurity, June to November 2026 outlook*, pp. 17, 29 (Jun. 2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/; FEWS, *Haiti - Food Security Outlook Update*, p. 2 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print ("The entrenchment of a conflict economy is reinforcing constraints on market access and livelihoods."); Jacqueline Charles, *Hunger persists across Haiti where floods, armed attacks, high fuel costs threaten gains*, Miami Herald (Apr. 20, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article315440903.html ("Rising fuel costs are driving up the cost of delivering food, while the threat of violence limits access to people most in need. . . . Even small increases in the price of food and fuel—driven in part by global disruptions such as the conflict in Iran, which is pushing up energy and fertilizer costs—translate into immediate consequences for families who are already on the brink of famine.") (*internal quotations omitted*); IPC, *Haiti: Acute Food Security Situation Projection Update for March - June 2026* (Apr. 16, 2026), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Haiti_Acute_Food_Insecurity_Projection_Update_Mar_Jun2026_Snapshot.pdf; Evens Sanon & Dánica Coto, *Haitians cut back on already scarce food and ask how they'll survive rising fuel prices*, Associated Press (Apr. 12, 2026), https://apnews.com/article/haiti-oil-prices-food-gas-transportation-iran-6ec63f1dd3a2ed106555dfe73fe383a6; OCHA, *Haiti: Nationwide Humanitarian Response Situation Report No.1 – 1 February – 31 March 2026* (Apr. 10, 2026), https://www.unocha.org/publications/report/haiti/haiti-overview-humanitarian-response-national-level-situation-report-no-1-february-march-2026 (the hunger crisis is "driven by rising food prices, market disruptions, loss of livelihoods and reduced access to agricultural areas").

[327] Reuters, *Haiti gang retaliation leaves at least 11 dead after security operation* (Sep. 28, 2026), https://www.reuters.com/world/americas/haiti-gang-retaliation-leaves-least-11-dead-after-security-operation-2026-09-29/ (reporting on an the latest in a series of armed group attacks "in the farming heartleand of Artibonite*")*; Jude Pierre Louis, *'We cannot take it anymore': Haiti's informal vendors protest over gang warfare*, Global Voices (Sep. 27, 2026), https://globalvoices.org/2026/09/27/we-cannot-take-it-anymore-haitis-informal-vendors-protest-over-gang-warfare/ ("Key agricultural hubs in the Artibonite department and parts of the Centre department are now under gang control, with armed groups driving out farmers, destroying crops, and burning down homes."); Rhinews, *Saint-Michel-de-l'Attalaye : une attaque armée à Marmont fait au moins un mort et trois blessés par balles…* (Sep. 16, 2026), https://www.rhinews.com/actualites/saint-michel-de-lattalaye-une-attaque-armee-a-marmont-fait-au-moins-un-mort-et-trois-blesses-par-balles/ (during a deadly attack in the Marmont area in the Artibonite Department – which has seen an increase in attacks in the last two months – armed groups looted "a major intercommunal market in the Lower Artibonite region where various agricultural and food products, including potatoes and beans, are sold," stealing merchandise and livestock); Haiti Libre, *Haiti - Crisis: Haiti faces the collapse of its agriculture* (Sep. 5, 2026), https://ftp.haitilibre.com/en/news-48376-haiti-crisis-haiti-faces-the-collapse-of-its-agriculture.html (insecurity has contributed to a "worrying decline" in "[t]he cattle, goat, sheep, pig, and poultry sectors," which "further weakens household livelihoods and considerably reduces the availability of locally produced animal protein; "[f]armers, often threatened or attacked, are hesitant to invest in their crops for fear of their safety"); GI-TOC, *From Port-au-Prince to the periphery: The ruralization of Haitian gang violence* (Sep. 4, 2026), https://globalinitiative.net/analysis/from-port-au-prince-to-the-periphery-the-ruralization-of-haitian-gang-violence/ (noting cattle theft by armed groups expanding into rural areas); Jacqueline Charles, *They came in silence: Why killings, abductions in Haiti mountain town have U.N. worried*, Miami Herald (Aug. 28, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317045603.html; Washington Post, *A U.N. force was supposed to secure Haiti. A year later, gangs rule* (Aug. 28, 2026), https://www.washingtonpost.com/opinions/2026/08/28/haitians-are-being-deported-into-violent-abyss-after-losing-tps/; BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, pp. 12, 18-19 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (armed group attacks in Séguin in April 2026 and in the Petite Riviére de l'Artibonite in June 2026 killed four farmers and "deliberately destroyed several rice mills belonging to local farmers;" more generally, "[i]n rural areas, the destruction of agricultural inputs, as well as the theft of crops and livestock, was frequent, undermining farmers' livelihoods and worsening an already critical humanitarian situation"); OCHA, *Haiti Humanitarian Bulletin March - May 2026*, p. 2 (Jul. 13, 2026), https://reliefweb.int/report/haiti/ocha-haiti-humanitarian-bulletin-march-may-2026 ("Between 5% and 8% of agricultural households in the most affected areas [in the Artibonite Department] have seen their production directly compromised. Beyond the statistics, the situation demonstrates how violence is profoundly transforming livelihoods and weakening food security, affecting both displaced populations and the communities that host them."); Fenel Pélissier, *Des bandits armés « volent des terrains » à Jérémie*, AyiboPost (Jul. 10, 2026), https://ayibopost.com/des-bandits-armes-volent-des-terrains-a-jeremie/ ("[A]rmed individuals are entering properties and subdividing land without the owners' consent [in Haiti's southern Departments]. . . . in order to destroy the food that was there: figs, bananas, yams."); Harriet Barber, *'It was a massacre': Haiti gangs carry out mass killings across the country*, The Guardian (Jul. 2, 2026), https://www.theguardian.com/global-development/2026/jul/02/it-was-a-massacre-haiti-gangs-carry-out-mass-killings-across-the-country (describing recent armed group attacks on farming communities); FAO & WFP, *Hunger Hotspots, FAO-WFP early warnings on acute food insecurity, June to November 2026 outlook*, pp. 5, 29 (Jun. 2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/ ("The expansion of gang violence into previously less-affected districts in Haiti is . . . severely constraining . . . agricultural production. . . . Overall agricultural output remains insufficient to meet food needs, keeping food availability and access constrained."); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, pp. 8, 11, 16 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 (reporting that armed groups "killed residents working in their fields" in Kenscoff, while others "frequently carry out incursions into the mountainous localities of Mirebalais in order to steal livestock, harvests and other property"); Jean Junior Celestin, *L'état des routes autour de l'aéroport pèse sur l'activité économique, le secteur privé interpelle le gouvernement*, Le Nouvelliste (May 4, 2026), https://lenouvelliste.com/article/266946/letat-des-routes-autour-de-laeroport-pese-sur-lactivite-economique-le-secteur-prive-interpelle-le-gouvernement (insecurity in the Cul-de-Sac Plain is "halt[ing] . . . strategic rice production in Artibonite"); Jacqueline Charles, *Hunger persists across Haiti where floods, armed attacks, high fuel costs threaten gains*, Miami Herald (Apr. 20, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article315440903.html ("[A]rmed gangs have intensified attacks. In the southeast, gang members targeted rural communities, stealing livestock and forcing residents to flee. . . . At the same time, violence continues to escalate in the Artibonite region, considered the country's breadbasket."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 15 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("In the Artibonite and Centre departments, gangs robbed farmers, destroyed agricultural assets."); *see also* Reuters, *At least 70 killed, 30 wounded in Haiti gang attack, rights group says*, Al Jazeera (Mar. 31, 2026), https://www.aljazeera.com/news/2026/3/31/at-least-70-killed-30-wounded-in-haiti-gang-attack-rights-group-says (reporting on an armed group attack in "Haiti's breadbasket Artibonite region"); *cf.* FEWS, *Haiti - Food Security Outlook Update*, p. 1 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print (noting that the "combined effects of insecurity, rising production costs, and weak incomes" are keeping agricultural performance below average).

[328] Jude Pierre Louis, *'We cannot take it anymore': Haiti's informal vendors protest over gang warfare*, Global Voices (Sep. 27, 2026), https://globalvoices.org/2026/09/27/we-cannot-take-it-anymore-haitis-informal-vendors-protest-over-gang-warfare/ ("[B]ecause of increased gang activity, the two main regions that supply Port-au-Prince with food have now been cut off. . . . putting the lives of rural farmers in constant danger as they attempt to bring their produce to market."); World Bank, *Haiti - Pathways to Growth Amid Rising Risks (June 2026)*, p. 22 (Sep. 9, 2026), https://documents1.worldbank.org/curated/en/099090826162019905/pdf/P502118-1d02f9d9-19f2-442e-a151-be8af55422b3.pdf (reporting that "[s]upply chain disruptions severely impacted agricultural output," while the "[t]otal lost output in the agricultural sector from 2018 to FY2025 is estimated at about 8 percent of GY2025 GDP;" armed group control of roads linking Port-au-Prince to the south and north have cut off access to key agricultural areas where vetiver, cocoa, and mangoes are produced); Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees (armed groups are "cutting off

farmers from their markets and populations from food stocks," with the hunger crisis reflecting "not an absence of food so much as an absence of access"); Haiti Libre, *Haiti - Crisis: Haiti faces the collapse of its agriculture* (Sep. 5, 2026), https://ftp.haitilibre.com/en/news-48376-haiti-crisis-haiti-faces-the-collapse-of-its-agriculture.html (in addition to preventing farmers from accessing markets to sell their goods, "[i]nsecurity limits the travel necessary to purchase seeds, fertilizers, and other inputs, and it even discourages cooperative initiatives among farmers," leaving land "underutilized, and the country's agricultural potential . . . severely hampered"); Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html (blaming "the continuing security-related disruptions to transportation and logistics" for diminished agricultural output); FEWS, *Haiti - Food Security Outlook Update*, p. 1 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print; Evens Sanon & Dánica Coto, *Haitians cut back on already scarce food and ask how they'll survive rising fuel prices*, Associated Press (Apr. 12, 2026), https://apnews.com/article/haiti-oil-prices-food-gas-transportation-iran-6ec63f1dd3a2ed106555dfe73fe383a6; UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 15 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74.

[329] *See* ICRC, *Haiti: Escalating armed violence in Port-au-Prince cuts people off from lifesaving services* (Apr. 2, 2026), https://www.icrc.org/en/article/haiti-escalating-armed-violence-cuts-people-off-lifesaving-services ("In the most affected neighbourhoods. . . . [r]outine activities . . . [like] going to the market . . . can put people at risk of stray bullets, forced recruitment, sexual violence or disappearance.").

[330] Jess Obert, *US Funding Cuts Fuel Child Recruitment Into Haitian Armed Groups*, New Humanitarian (Aug. 19, 2026), https://www.thenewhumanitarian.org/news-feature/2026/08/19/us-funding-cuts-fuel-child-recruitment-haitis-armed-group ("Hunger and desperation are powerful drivers of gang recruitment. People in displacement centres often face starvation — conditions that fuel vulnerability to armed groups. The majority of children in gangs don't work and don't have parents who earn enough to care for them. 'They are hungry,' said [independent peace facilitator Jean-Gilles Bernard] Camille. 'Some are joining to find enough to eat.'"); Jacqueline Charles, *Hunger persists across Haiti where floods, armed attacks, high fuel costs threaten gains*, Miami Herald (Apr. 20, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article315440903.html ("We cannot build peace when families have nothing to feed their children. Hunger opens the door to armed groups who will exploit the crisis, luring children with food and preying on women and young mothers who are struggling to provide for their families," says the WFP Haiti country director) (*internal quotations omitted*); IPC, *Haiti: Acute Food Security Situation Projection Update for March - June 2026* (Apr. 16, 2026), https://www.ipcinfo.org/fileadmin/user_upload/ipcinfo/docs/IPC_Haiti_Acute_Food_Insecurity_Projection_Update_Mar_Jun2026_Snapshot.pdf ("[M]any of the most vulnerable people [are] forced to join armed groups in order to feed their families."); Evens Sanon & Dánica Coto, *Haitians cut back on already scarce food and ask how they'll survive rising fuel prices*, Associated Press (Apr. 12, 2026), https://apnews.com/article/haiti-oil-prices-food-gas-transportation-iran-6ec63f1dd3a2ed106555dfe73fe383a6 ("[G]angs easily recruit children whose families need food and money."); *see also* note 267.

[331] Haiti Libre, *Haiti - Crisis: Haiti faces the collapse of its agriculture* (Sep. 5, 2026), https://ftp.haitilibre.com/en/news-48376-haiti-crisis-haiti-faces-the-collapse-of-its-agriculture.html (pointing to "poor governance, a lack of coherent policies, environmental degradation, . . . a lack of technical assistance," over-reliance on food imports, failures to sustainably manage natural resources, and low public investment in already-inadequate agricultural infrastructure as principal factors in Haiti's protracted food crisis); FAO & WFP, *Hunger Hotspots, FAO-WFP early warnings on acute food insecurity, June to November 2026 outlook*, pp. 17, 29 (Jun. 2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/ ("The persistent economic crisis, additional pressure on fuel and fertilizer prices due to the Middle East conflict and below-average rainfall forecast during the outlook period will further undermine food availability and access."); Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html ("Agriculture output, for example, fell 4.8 percent amid the effects of last year's Hurricane Melissa, which battered the southern region, and the continuing security-related disruptions to transportation and logistics."); *see also* Gordon Whitman, *Haitian Farmer Organizations Welcome $38.7 million Investment to Fight Hunger*, Faith in Action International (Oct. 6, 2026), https://faithinactioninternational.org/haitian-farmer-organizations-welcome-38-7-million-investment-to-fight-hunger/ (the Inter-American Development Bank, facing sustained pressure from Haitian organizations, made changes to an agricultural investment project that the coalition said "failed to consult with local organizations, over-relied on large outside contractors, and did not achieve sustainable results").

[332] FAO & WFP, *Hunger Hotspots, FAO-WFP early warnings on acute food insecurity, June to November 2026 outlook*, p. 29 (Jun. 2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/ ("[S]ignificant funding gaps . . . will further undermine access to and availability of food over the outlook period"); *cf.* Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html ("More than half of the nearly 12 million population is experiencing crisis, emergency or catastrophic levels of hunger, the World Bank said, while social assistance programs reached fewer than one in 10 Haitians."); Jacqueline Charles, *Hunger persists across Haiti where floods, armed attacks, high fuel costs threaten gains*, Miami Herald (Apr. 20, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article315440903.html ("Haiti's hunger crisis has worsened as humanitarian aid has declined."); *see also* 459-465.

[333] UN General Assembly & Security Council, *Report of the Secretary-General on Children and armed conflict*, UN Doc. A/80/723-S/2026/357 (Jun. 16, 2026), https://docs.un.org/en/A/80/723 (reporting 18 attacks on hospitals in 2025); Tirana Hassan, *The Crisis I Witnessed in Haiti*, TIME (Jun. 26, 2026), https://time.com/article/2026/06/25/the-crisis-i-witnessed-in-haiti/ (MSF USA CEO Tirana Hassan: "[M]edical facilities in Port-au-Prince. . . . have been looted, burned, and abandoned.").

[334] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 87, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 9 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026; BINUH, *Flash Report - Intensification of Gang Violence in the Plaine du Cul-de-Sac Area and Cité Soleil (March - July 2026)*, p. 3 (Aug. 6, 2026), https://binuh.unmissions.org/en/document-library/flash-report-intensification-of-gang-

violence-in-the-plaine-du-cul-de-sac-1 (armed group violence in the Plaine du Cul-de-Sac and Cité Soleil between March and July 2026 resulted in the suspension of health services in affected neighborhoods); MSF, *In Cité Soleil, people risk their lives to seek medical care* (Jul. 22, 2026), https://www.msf.org/haiti-people-risk-their-lives-seek-medical-care; Daniel Dickinson, *Haiti: Signs of hope despite gang violence and political uncertainty*, UN News (Jul. 19, 2026), https://news.un.org/en/story/2026/07/1167963; MSF, *Haiti: MSF forced to evacuate hospital and temporarily suspend activities in Cité Soleil* (May 11, 2026), https://www.msf.org/haiti-msf-forced-evacuate-hospital-cite-soleil (hospitals in Cité Soleil, including MSF and Hopital Fontaine, were forced to suspend operations and evacuate patients due to armed group violence in the area; "[c]urrently, not a single hospital is open in the area where the fighting is taking place"); *see also* OHCHR, *High Commissioner Türk: We need all eyes on Haiti* (Oct. 2, 2026), https://www.ohchr.org/en/statements-and-speeches/2026/10/high-commissioner-turk-we-need-all-eyes-haiti (reporting that 40% of Haitians lack access to basic healthcare); *but see* Haiti Libre, *Nippes : Surgical caravan, nearly 200 patients already operated on free of charge* (Jun. 18, 2026), https://www.haitilibre.com/en/news-47777-nippes-surgical-caravan-nearly-200-patients-already-operated-on-free-of-charge.html (reporting that the Jules Fleury Hospital in Anse-à-Veau (in the Nippes Department) was able to reopen its operating theater, "which had been out of service for some time").

[335] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 87, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; *see also* PAHO, *Haiti Humanitarian Crisis - Grade 3*, https://www.paho.org/en/haiti-humanitarian-crisis-grade-3 (last visited Oct. 21, 2026) (reporting that "26% of inpatient health facilities are fully functional, 49% partially functional, 21% non-functional and 4% have been destroyed," while "[i]n the PAP metro area 37 % of inpatient health facilities are fully functional, 13% partially functional, 40 % non-functional and 10% have been destroyed"); Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("As of last year, 70 percent of Port-au-Prince's healthcare facilities were closed."); OCHA, *Haiti Crisis in Numbers* (May 7, 2026), https://www.unocha.org/publications/report/haiti/haiti-crisis-numbers-7-may-2026 (reporting that as of November 2025, 12% of health facilities were fully operational); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 28, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("As at January 2026, there were only 37 fully operational health facilities out of 100 in Port-au-Prince. Nationwide, no more than 26% of 268 inpatient facilities were fully functional, severely impeding access to health services.").

[336] The State University Hospital, Haiti's largest public hospital, closed in March 2024 due to repeated attacks and looting, and remains closed after armed groups attacked the hospital's planned reopening in December 2024. The Bernard Mevs Hospital, Haiti's only neurological trauma center, has been closed since armed groups set the hospital on fire and destroyed equipment worth millions of dollars in December 2024. The University Hospital of Mirebalais closed in April 2025 after an armed group attack that forced patients and staff to evacuate. Juhakenson Blaise, *Student shot during second protest for the relocation of Haiti's largest hospital*, Haitian Times (Jul. 2, 2026), https://haitiantimes.com/2026/07/02/medical-student-shot-protest-general-hospital-relocation/ ("Students say government's promises to temporarily relocate the [State University] hospital have yet to materialize despite repeated commitments from the Ministry of Public Health and Population"); Juhakenson Blaise, *Tear-gassed students in Haiti plan new march to get hospital moved from gang territory*, Haitian Times (Jun. 30, 2026), https://haitiantimes.com/2026/06/30/medical-students-tear-gassed-protest-haiti-hospital-relocation/; UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 15 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74; *see also* IJDH, *Human Rights Update – July 2025*, p. 11 (Jul. 2025), https://www.ijdh.org/wp-content/uploads/HRU-July-2025.pdf.

[337] MSF, *Haïti : MSF contrainte de suspendre les activités de la Maternité Isaïe Jeanty face à l'escalade des violences* (Jun. 23, 2026), https://www.msf.ch/nos-actualites/communiques-presse/haiti-msf-contrainte-suspendre-activites-maternite-isaie-jeanty (MSF said "the situation is untenable: the hospital walls are riddled with bullets, our teams are exhausted, and it is too difficult for ambulances to refer patients and find suitable facilities to treat them") (*internal quotations omitted*); MSF, *MSF resumes care at maternity hospital in Haitian capital* (Jul. 29, 2026), https://www.doctorswithoutborders.org/latest/msf-resumes-care-maternity-hospital-haitian-capital; MSF, *Haiti: MSF forced to evacuate hospital and temporarily suspend activities in Cité Soleil* (May 11, 2026, updated Jun. 3, 2026), https://www.msf.org/haiti-msf-forced-evacuate-hospital-cite-soleil (noting that an MSF security guard was struck by a bullet inside the Cité Soleil compound before the temporary suspension, and that although the hospital has reopened as of June 1, resumption of outpatient and inpatient services at the hospital remains conditional on security; *see also* Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees (offering an in-depth account of the forced closures and their impacts).

[338] MSF, *Haiti: MSF forced to evacuate hospital and temporarily suspend activities in Cité Soleil* (May 11, 2026), https://www.msf.org/haiti-msf-forced-evacuate-hospital-cite-soleil (medical teams took in "more than 800 people seeking safety"); MSF, *Haïti : MSF contrainte de suspendre les activités de la Maternité Isaïe Jeanty face à l'escalade des violences* (Jun. 23, 2026), https://www.msf.ch/nos-actualites/communiques-presse/haiti-msf-contrainte-suspendre-activites-maternite-isaie-jeanty ("On the evening of June 15, more than a hundred people—mostly women and children—fleeing the fighting found refuge and access to water at the maternity hospital.").

[339] Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees; Jacqueline Charles, *Aid cuts forcing women's groups worldwide to close. In Haiti, they are feeling the toll*, Miami Herald (Jul. 10, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316461717.html ("Health workers [at a hospital in Saint Marc in the Artibonite Department and Hôpital Universitaire de la Paix in Port-au-Prince] spoke of severe exhaustion, skyrocketing maternal mortality, increasing numbers of survivors of sexual violence and of women giving birth and then forced to sleep on the floor with their newborn babies."); Tirana Hassan, *The Crisis I Witnessed in Haiti*, Time (Jun. 26, 2026), https://time.com/article/2026/06/25/the-crisis-i-witnessed-in-haiti/ (MSF USA CEO Tirana Hassan: "When patients can reach health facilities, the needs are immense. On some mornings, hundreds of people line up outside Doctors Without Borders' Cite Soleil hospital, seeking everything from emergency care to follow-up appointments for chronic conditions like diabetes or hypertension. Admissions to our main sexual violence clinic in Port-au-Prince have nearly tripled since 2022, to more than 250 per month."); MSF, *Haiti: MSF forced to evacuate hospital and temporarily suspend activities in Cité Soleil* (May 11, 2026),

https://www.msf.org/haiti-msf-forced-evacuate-hospital-cite-soleil (in the days prior to the temporary closure of the MSF hospital in Cité Soleil, "medical teams have had to cope with an influx of patients with gunshot wounds"); Jonasson Odigène, *Two Nurses Describe Treating Patients Amid Gunfire in Cité Soleil*, Le Nouvelliste (May 13, 2026), https://lenouvelliste.com/en/article/267274/two-nurses-describe-treating-patients-amid-gunfire-in-cite-soleil (a frontline nurse in the MSF hospital describes receiving 19 gunshot wound victims in one night during attacks in Cité Soleil; the next day, the facility received 40 more in the span of 12 hours); *see also* Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees (describing the difficulty of responding to waves of armed group violence, and noting that in addition to gunshot wounds, medical staff have to plan for more traffic accident victims as "dangerous conditions meant people would drive more recklessly"); UN, *Kenscoff Massacre Exposes Worsening Brutality of Haiti's Gang Crisis, Security Council Hears, as Speakers Urge Rapid International Support* (Aug. 28, 2026), https://press.un.org/en/2026/sc16444.doc.htm (noting generally that "[h]ospitals are overwhelmed"); Caitlin Stephen Hu & Etant Dupain, *In the city where Haitian deportees are being sent, locals say they're not ready*, CNN (Aug. 21, 2026), https://www.cnn.com/2026/08/21/americas/haiti-ice-deporatations-cap-intl-latam (reporting that hospitals in Cap-Haïtien – a city in the north largely spared from armed group violence – are "overwhelmed with patients queuing outdoors" due to increased displacement from other regions, compounded by ongoing deportations from the United States); *but see* Jean Gilles Désinord, *Opérations anti-gangs : la PNH renforce son dispositifve méedical*, Vant Bèf Info (Sep. 19, 2026), https://vantbefinfo.com/operations-anti-gangs-la-pnh-renforce-son-dispositif-medical/ (reporting that the PNH has deployed three to four ambulances to provide medical assistance during security operations).

[340] Alterpresse, *Haïti-Santé : Reprise annoncée à l'hôpital public Justinien du Cap-Haïtien, après un mois de paralysie* (May 5, 2026), https://www.alterpresse.org/Haiti-Sante-Reprise-annoncee-a-l-hopital-public-universitaire-Justinien-apres-un-mois-de-paralysie; PAHO, *Haiti Humanitarian Crisis - Grade 3*, https://www.paho.org/en/haiti-humanitarian-crisis-grade-3 (last visited Oct. 21, 2026).

[341] Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ (Hôpital Universitaire de La Paix Medical Director: "Every day, the operating theatres are at full capacity. We have to prioritize certain critical cases and postpone others, sometimes at the cost of human lives.") (*internal quotations omitted*); *see also* Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees ("HUP's medical director, Dr. Jean Philippe Lerbourg, said that patient loads have doubled in recent years: now two thousand emergency cases and between four and five thousand primary consultations. 'There may be more patients,' Dr. Lerbourg said, 'but we still have the same number of beds.'"); Jacqueline Charles, *Aid cuts forcing women's groups worldwide to close. In Haiti, they are feeling the toll*, Miami Herald (Jul. 10, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316461717.html.

[342] Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees (taking a sick child to the hospital is "now a life-and-death gamble"); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 87, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714; MSF, *In Cité Soleil, people risk their lives to seek medical care* (Jul. 22, 2026), https://www.msf.org/haiti-people-risk-their-lives-seek-medical-care (in Cité Soleil, "[w]hen residents . . . need medical care, they regularly face an impossible dilemma: go seek treatment and take on all risk, or forgo it and let their condition worsen, potentially beyond being able to be treated"); Tirana Hassan, *The Crisis I Witnessed in Haiti*, TIME (Jun. 26, 2026), https://time.com/article/2026/06/25/the-crisis-i-witnessed-in-haiti/ (MSF USA CEO Tirana Hassan: "Many people are too afraid to seek health care, even if they have an urgent need. Fighting often forces people to stay home for days, and they can't even find safe passage to receive care if they have been hit by stray bullets (a frequent occurrence) or after sexual assault."); Hope for Haiti, *Hope for Haiti Partners with Americares to Expand Mobile Healthcare Services and Address Growing Diabetes Crisis in Southern Haiti*, Newswire (May 20, 2026), https://www.newswire.com/news/hope-for-haiti-partners-with-americares-to-expand-mobile-healthcare-22781474 ("Approximately 60% of the population in the Greater South lacks access to adequate medical care, with rural communities disproportionately affected by geographic isolation, transportation barriers, and shortages of trained healthcare professionals."); Jonasson Odigène, *Two Nurses Describe Treating Patients Amid Gunfire in Cité Soleil*, Le Nouvelliste (May 13, 2026), https://lenouvelliste.com/en/article/267274/two-nurses-describe-treating-patients-amid-gunfire-in-cite-soleil (a nurse describes braving "every danger to reach the hospital" for her shift during intense armed group clashes in Cité Soleil); ICRC, *Haiti: Escalating armed violence in Port-au-Prince cuts people off from lifesaving services* (Apr. 2, 2026), https://www.icrc.org/en/article/haiti-escalating-armed-violence-cuts-people-off-lifesaving-services ("Armed violence . . . restricts all kinds of movement, including the transfer of patients to the few remaining health facilities operating in the capital."); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 38, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("Patients face blocked roads and must traverse active conflict zones to reach care, and it has been over a year since Médecins sans frontières suspended its ambulance service due to repeated attack.").

[343] Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("Beds, staff, crucial equipment, and medicine are all in short supply. . . . The medical director of a clinic in Haiti's Western Department told USCRI that while demand for medical services has surged, access to life-saving medication is limited and unaffordable."); Tirana Hassan, *The Crisis I Witnessed in Haiti*, TIME (Jun. 26, 2026), https://time.com/article/2026/06/25/the-crisis-i-witnessed-in-haiti/; PAHO, *Haiti Humanitarian Crisis - Grade 3*, https://www.paho.org/en/haiti-humanitarian-crisis-grade-3 (last visited Oct. 21, 2026); *see also* Rezo Nòdwes, *Haïti | Chaos — Arcahaie sous pression des gangs, Cabaret toujours sous leur plein contrôle* (Aug. 26, 2026), https://rezonodwes.com/2026/08/haiti-chaos-arcahaie-sous-pression-des-gangs-cabaret-toujours-sous-leur-plein-controle/ ("Those with gunshot wounds [in Arcahaie, a commune in the West Department] are experiencing serious difficulties in receiving appropriate care, as the local hospital lacks the medical resources and specialists needed to treat some of the most seriously injured."); Jacqueline Charles, *A fragile return of medical care in Haiti after weeks of violence roil capital*, Miami Herald (Jun. 5, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316008593.html (armed group members killed three police officers who were trying to clear a road for the delivery of oxygen to a nearby hospital).

[344] Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("Without power or alternative fuel, the hospital equipment needed to keep patients alive cannot run.").

[345] Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/; Juhakenson Blaise, *Student shot during second protest for the relocation of Haiti's largest hospital*, Haitian Times (Jul. 2, 2026), https://haitiantimes.com/2026/07/02/medical-student-shot-protest-general-hospital-relocation/ ("With the General Hospital effectively closed . . . thousands of patients have lost access to one of Haiti's principal public health facilities."); *see also* Juhakenson Blaise, *Tear-gassed students in Haiti plan new march to get hospital moved from gang territory*, Haitian Times (Jun. 30, 2026), https://haitiantimes.com/2026/06/30/medical-students-tear-gassed-protest-haiti-hospital-relocation/ ("[S]ince 2012, the [State University] hospital has treated over 200,000 patients annually.").

[346] Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/; MSF, *In Cité Soleil, people risk their lives to seek medical care* (Jul. 22, 2026), https://www.msf.org/haiti-people-risk-their-lives-seek-medical-care (describing cost-related barriers to treatment for chronic illnesses for people living in Cité Soleil); Juhakenson Blaise, *Tear-gassed students in Haiti plan new march to get hospital moved from gang territory*, Haitian Times (Jun. 30, 2026), https://haitiantimes.com/2026/06/30/medical-students-tear-gassed-protest-haiti-hospital-relocation/ (students protesting to demand the reopening of the State University Hospital say "[i]t is also where the most vulnerable people can access healthcare. . . . but unfortunately the government is not providing us with a space to serve these people") (*internal quotations omitted*); Claudy Junior Pierre, *The North's Health Sector Needs Attention Before a Crisis Erupts*, Le Nouvelliste (May 13, 2026) https://lenouvelliste.com/en/article/267260/the-norths-health-sector-needs-attention-before-a-crisis-erupts (in Cap-Haïtien, the closure of the Justinien University Hospital resulted in "patients . . . moving from one private center to another in search of minimal care at costs that often exceeded their financial means — impoverishing them in the process"); IRC, *Families in Haiti Face Impossible Choices as Violence Surges and Public Services Collapse, IRC Finds* (Apr. 16, 2026), https://www.rescue.org/press-release/families-haiti-face-impossible-choices-violence-surges-and-public-services-collapse (an IRC survey of households in the West, Artibonite, and Center Departments found that 75% are unable to afford health services); *see also* MSF, *MSF resumes care at maternity hospital in Haitian capital* (Jul. 29, 2026), https://www.doctorswithoutborders.org/latest/msf-resumes-care-maternity-hospital-haitian-capital (an MSF patient who has given birth to nine children at home said "[i]t is difficult to access health care . . . when you do not have money").

[347] MSF, *In Cité Soleil, people risk their lives to seek medical care* (Jul. 22, 2026), https://www.msf.org/haiti-people-risk-their-lives-seek-medical-care ("'Our care is free, but there are people for whom simply having to take a mototaxi to get here, which costs around 100 gourdes, or about 70 US cents, means they can't afford the transport and so can't reach our hospital,' explains François Batistin, MSF deputy project coordinator in Cité Soleil.").

[348] MSF, *In Cité Soleil, people risk their lives to seek medical care* (Jul. 22, 2026), https://www.msf.org/haiti-people-risk-their-lives-seek-medical-care (MSF's head of operations for Haiti says "[t]he Ministry of Health's budget is very limited. . . . [and] Haiti's humanitarian crisis has been underfunded internationally for years") (*internal quotations omitted*); *see also* Claudy Junior Pierre, *The North's Health Sector Needs Attention Before a Crisis Erupts*, Le Nouvelliste (May 13, 2026) https://lenouvelliste.com/en/article/267260/the-norths-health-sector-needs-attention-before-a-crisis-erupts (reporting the lack of government measures to strengthen public hospitals in Haiti's North Department).

[349] Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees; *see also* notes 459-465.

[350] Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees (staff who remain at the Hôpitale Universitaire de La Paix "rarely receive their paychecks on time"); Le Nouvelliste, *Des employés du CAN réclament le paiement des arriérés de salaire* (Jul. 10, 2026), https://lenouvelliste.com/article/269692/des-employes-du-can-reclament-le-paiement-des-arrieres-de-salaire (National Ambulance Center employees demonstrated to protest months of unpaid wages, indicating "that some are owed more than ten months of back pay and threaten[ing] to go on strike if their demands are not met"); Alterpresse, *Haïti-Santé : Reprise annoncée à l'hôpital public Justinien du Cap-Haïtien, après un mois de paralysie* (May 5, 2026), https://www.alterpresse.org/Haiti-Sante-Reprise-annoncee-a-l-hopital-public-universitaire-Justinien-apres-un-mois-de-paralysie (a nearly month-long strike by employees of the Justinien Public Hospital in Cap-Haïtien to demand 15 months of back wages ended in early May 2026; interns at the Hôpital Universitaire de la Paix in Port-au-Prince went on strike in April 2026 to protest "unpaid salaries dating back to July 2025," resulting in essential services operating at reduced capacity); *see also* Claudy Junior Pierre, *The North's Health Sector Needs Attention Before a Crisis Erupts*, Le Nouvelliste (May 13, 2026) https://lenouvelliste.com/en/article/267260/the-norths-health-sector-needs-attention-before-a-crisis-erupts (after the Justinien University Hospital was closed due to strikes, "[n]o public hospital center in the surrounding areas was capable of absorbing the suffering of patients").

[351] Juhakenson Blaise, *Student shot during second protest for the relocation of Haiti's largest hospital*, Haitian Times (Jul. 2, 2026), https://haitiantimes.com/2026/07/02/medical-student-shot-protest-general-hospital-relocation/ ("[H]undreds of medical and nursing students have been unable to complete required clinical training."); Juhakenson Blaise, *Tear-gassed students in Haiti plan new march to get hospital moved from gang territory*, Haitian Times (Jun. 30, 2026), https://haitiantimes.com/2026/06/30/medical-students-tear-gassed-protest-haiti-hospital-relocation/ (an article published by doctors and medical students in May 2025 said the "situation is jeopardizing the very future of medical specialties in the country"); *see also* U.S. Department of State, *Haiti*, https://travel.state.gov/en/international-travel/travel-advisories/haiti.html (last visited Oct. 21, 2026) ("Hospitals and clinics in Haiti have limited trained staff and lack basic resources"); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 15 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 (noting "the departure of an estimated 40 per cent of medical personnel").

[352] According to information from feminist Haitian organization *Zantray Fanm Kreyòl* (**ZAFAK**), "[g]ender-based violence, forced displacement, the loss of family members and property, and repeated exposure to violence can lead to trauma, anxiety, depression, sleep disorders, isolation, and other long-lasting psychological consequences." (Notes on file). Two studies conducted in 2026 found that more than half of displaced persons surveyed suffered severe psychological distress and showed signs of probably or severe post-traumatic stress disorder, with women and those displaced in rural areas disproportionately impacted. Jude Mary Cénat et al., *Prevalence and Factors Associated with Post-Traumatic Stress Disorder Among Internally Displaced Populations Due to Gang Violence in Haiti*, Journal of Anxiety Disorders 121 (Jul. 2026), https://www.sciencedirect.com/science/article/pii/S0887618526000691 (finding that 57.2% overall showed signs of probable/severe post-traumatic stress disorder, increasing to 62.4% among women and 69.3% among rural respondents); Jude Mary Cénat et al., *Severe Psychological Distress Among Internally Displaced Adults Due to Armed Gang Violence in Haiti*, Journal of Safety Science and Resilience 7(3) (Sep. 2026), https://www.sciencedirect.com/science/article/pii/S2666449626000174 (finding that 62.1% of displaced adults suffered severe psychological distress, increasing to 65.2% among women and 80.2% among rural respondents).

[353] According to information shared by knowledgeable local organizations on file with authors, including OFASO and ZAFAK. *See also* BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 18 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 ("Beyond the immediate trauma, the long-term consequences of . . . sexual violence are devastating and frequently result in lasting physical, psychological, economic, and social impacts. Among the victims recorded during the period under review, at least one died by suicide after being unable to overcome the psychological consequences of the assault suffered, according to a note left by the victim."); Maye Primera, *'Nobody should be forced to return to Haiti': UN expert warns the island is unfit to receive deportees*, El País (Aug. 9, 2026), https://english.elpais.com/usa/2026-08-09/nobody-should-be-forced-to-return-to-haiti-un-expert-warns-the-island-is-unfit-to-receive-deportees.html ("'In gang-controlled areas children . . . [are] exposed to incredible levels of violence. They see it, they hear it and sometimes they are victims of it, or their relatives or close friends are,' [the UN's independent expert on human rights in Haiti William] O'Neill says."); Jacqueline Charles, *Aid cuts forcing women's groups worldwide to close. In Haiti, they are feeling the toll*, Miami Herald (Jul. 10, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316461717.html (a nine-year-old girl who was raped by eight men "drank poison and died" after her rapists came to the hospital and pressured her and her mother not to pursue legal action against them; "[t]wo days after that, the mother went insane and was running in the street") (*internal quotations omitted*); OCHA, *Haiti Crisis in Numbers* (May 7, 2026), https://www.unocha.org/publications/report/haiti/haiti-crisis-numbers-7-may-2026 (reporting that 400,000 "children, adolescents, and caregivers are in need of mental health and psychosocial support"); *see also* Christina Silveiro, *Back to school in Haiti: 'Madame, can you stop what the gangs are doing to us?'*, UN News (Sep. 15, 2026), https://news.un.org/en/story/2026/09/1168337 (a father says that "[s]chooling is like therapy for . . . children [displaced by the violence," but disruptions to education make attending and learning difficult).

[354] Juhakenson Blaise, *Mental health crisis in Haiti: The unseen impact of gang violence and insecurity*, Haitian Times (Mar. 18, 2024), https://haitiantimes.com/2024/03/18/haiti-mental-health-crisis-haiti-gang-violence/.

[355] According to information shared by knowledgeable local organizations on file with authors, including OFASO and ZAFAK. BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 18 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 (UN and other NGO efforts to provide psychosocial support are "limited by a lack of funding and personnel," and institutional responses to mental health issues "remain insufficient"); BINUH, *Quarterly Report on the Human Rights situation in Haiti (Jan - March 2026)*, p. 15 (May 8, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-jan-march-2026 ("Existing responses [to the impact of the crisis on children] remain limited and fragmented: social protection programmes cover few people and are absent from urban areas affected by insecurity, while access to financial services remains restricted. Schools and child-friendly spaces play an essential protective role but remain fragile due to insecurity and lack of funding. Mental health services and vocational training opportunities are also insufficient, especially in areas under gang control."); *see also* Jonasson Odigène, *Two Nurses Describe Treating Patients Amid Gunfire in Cité Soleil*, Le Nouvelliste (May 13, 2026) https://lenouvelliste.com/en/article/267274/two-nurses-describe-treating-patients-amid-gunfire-in-cite-soleil (already overwhelmed nurses – who themselves are exposed to significant emotional trauma – "in some cases intervene in the psychological care of patients"); *but see* Haiti Libre, *UNDP and UEH sign an agreement to strengthen the psychosocial well-being of displaced persons* (Aug. 1, 2026), https://www.haitilibre.com/en/news-48119-undp-and-ueh-sign-an-agreement-to-strengthen-the-psychosocial-well-being-of-displaced-persons.html (a UN Development Programme representative and the Rector of the State University of Haiti signed a Memorandum of Understanding that aims to "provide local psychosocial support to displaced populations and host communities, while simultaneously strengthening national capacities in mental health and psychosocial support").

[356] Jonasson Odigène, *Two Nurses Describe Treating Patients Amid Gunfire in Cité Soleil*, Le Nouvelliste (May 13, 2026) https://lenouvelliste.com/en/article/267274/two-nurses-describe-treating-patients-amid-gunfire-in-cite-soleil (a nurse describes the emotional toll of working on the front lines: "'I left with a feeling of helplessness. I felt like I had not done enough and that I had abandoned people who were counting on me,' she explained, emphasizing that she could not sleep during the night because of the memories of what she had experienced that day."); Jacqueline Charles, *Aid cuts forcing women's groups worldwide to close. In Haiti, they are feeling the toll*, Miami Herald (Jul. 10, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316461717.html (the founder of the Movement for the Integration and Emancipation of Disabled Women, a Haitian organization that provides psychological counseling and other support to women and girls with disabilities, said she "was traumatized for six months, crying, unable to eat" because she felt she had "failed" a child victim of sexual assault who later died by suicide and her mother).

[357] IJDH, *Broken UN Promises Lead to Haiti Cholera Resurgence* (Oct. 11, 2022), https://www.ijdh.org/wp-content/uploads/2022/10/Cholera-Press-Release-2022-EN.pdf; PAHO, *Haiti Humanitarian Crisis - Grade 3*, https://www.paho.org/en/haiti-humanitarian-crisis-grade-3 (last visited Oct. 21, 2026) ("Newly suspected cholera cases are still

reported in both IDP sites and communities, despite a decrease in cases."); UNICEF, *Haiti Humanitarian Situation Report No. 2*, pp. 2, 6 (Aug. 11, 2026), https://www.unicef.org/media/183661/file/Haiti-Humanitarian-Situation-Report-No.%202(Mid-Year),30-June-2026.pdf.pdf (despite a decrease in cases from 2025, "active transmissions in the Ouest, Centre and Artibonite departments, but particularly in the Ouest department municipalities of Cité Soleil and Delmas, resulted in 250 hospitalizations and two deaths (one community death and one institutional death) . . . [and] the situation continues to reflect persistent transmission hotspots among the most vulnerable populations").

[358] WHO, *Global Cholera and Acute Watery Diarrhoea (AWD) Dashboard*, https://who-global-cholera-and-awd-dashboard-1-who.hub.arcgis.com/ (last visited Oct. 21, 2026).

[359] PAHO, *Haiti Humanitarian Crisis - Grade 3*, https://www.paho.org/en/haiti-humanitarian-crisis-grade-3 (last visited Oct. 21, 2026) ("Conditions remain in place for a heightened risk of further spread of this and other diseases, notably in Internally Displaced Populations (IDP) sites."); Gallardo Honoré & Maryanne Buechner, *'I almost lost my daughter to cholera' – mother in Haiti turns pain into action*, UNICEF USA (Mar. 17, 2026), https://www.unicefusa.org/stories/i-almost-lost-my-daughter-cholera-mother-haiti-turns-pain-action; *see also* Section VI (*Access to water, sanitation, and hygiene*).

[360] PAHO, *Haiti Humanitarian Crisis - Grade 3*, https://www.paho.org/en/haiti-humanitarian-crisis-grade-3 (last visited Oct. 21, 2026).

[361] PAHO, *Haiti Humanitarian Crisis - Grade 3*, https://www.paho.org/en/haiti-humanitarian-crisis-grade-3 (last visited Oct. 21, 2026) (reporting 1,924 suspected cases of diphtheria, 159 confirmed cases, and 18 deaths as of June 20, 2026); Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("Many people are not vaccinated against diseases like diphtheria, a serious bacterial infection that damages the heart and lungs. Once uncommon in Haiti, diphtheria has emerged as a public health concern. . . . The medical director of the clinic in Haiti's Western Department further reported an outbreak of a scabies-like infectious skin disease known as sarcoptosis."); *see also* Claudy Junior Pierre, *Anthrax Claims Lives in Grand'Anse*, Le Nouvelliste (Sep. 7, 2026), https://lenouvelliste.com/en/article/271699/anthrax-claims-lives-in-grandanse (reporting an alert about suspected anthrax cases in the Grand'Anse); Lucnise Duquereste, *Les cas de lèpres se multiplient en Haïti*, AyiboPost (Jun. 8, 2026), https://ayibopost.com/les-cas-de-lepres-se-multiplient-en-haiti/ (reporting that "[c]onfirmed cases of leprosy are on the rise in Haiti," with 25 confirmed cases; the rise is attributed to "[t]he weakening of the health care system," mass displacement, and "[s]ocio-cultural barriers").

[362] Christina Silveiro, *Back to school in Haiti: 'Madame, can you stop what the gangs are doing to us?'*, UN News (Sep. 15, 2026), https://news.un.org/en/story/2026/09/1168337; BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, pp. 9, 18 (Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026; Maye Primera, *'Nobody should be forced to return to Haiti': UN expert warns the island is unfit to receive deportees*, El País (Aug. 9, 2026), https://english.elpais.com/usa/2026-08-09/nobody-should-be-forced-to-return-to-haiti-un-expert-warns-the-island-is-unfit-to-receive-deportees.html (the UN's independent expert on human rights in Haiti says that "[i]n gang-controlled areas children have very limited access to school") (*internal quotations omitted*); Rhinews, *Des syndicats d'enseignants dénoncent un « simulacre de concertation » sur la rentrée scolaire 2026-2027…* (Aug. 2, 2026), https://www.rhinews.com/culture-education/des-syndicats-denseignants-denoncent-un-simulacre-de-concertation-sur-la-rentree-scolaire-2026-2027/ (discussing generally concerns around "the impact of insecurity on the functioning of the education system"); Daniel Dickinson, *Haiti: Signs of hope despite gang violence and political uncertainty*, UN News (Jul. 19, 2026), https://news.un.org/en/story/2026/07/1167963 ("Violence continues to disrupt . . . education."); *see also, e.g.*, Rhinews, *Saint-Michel-de-l'Attalaye : une attaque armée à Marmont fait au moins un mort et trois blessés par balles…* (Sep. 16, 2026), https://www.rhinews.com/actualites/saint-michel-de-lattalaye-une-attaque-armee-a-marmont-fait-au-moins-un-mort-et-trois-blesses-par-balles/ (reporting that an attack by armed groups in the Marmont area of the Artibonite Department "affected school activities," forcing the local parish school to close "while children were still inside"); Pierre Josué Agénor Cadet, *Rentrée scolaire 2026-2027 : l'école à l'épreuve de la crise haïtienne*, Le Nouvelliste (Sep. 14, 2026), https://lenouvelliste.com/article/271907/rentree-scolaire-2026-2027-lecole-a-lepreuve-de-la-crise-haitienne (identifying obstacles to attending school, including insecurity and deteriorating economy); POHDH, *BILAN SEMESTRIEL 2026: Crise de gouvernance renforcée et détérioration des conditions socioéconomiques, la POHDH dresse le bilan des six premiers mois de l'année 2026*, pp. 19-21 (Jul. 30, 2026), https://pohdh-ht.org/media/documents/BILAN_SEMESTRIEL_POHDH_juillet_2026.pdf (describing many schools and universities in neighborhoods controlled by armed groups as inaccessible or abandoned, along with protests and strikes to protest related government inaction that brought school activities in several municipalities to a halt); UN General Assembly & Security Council, *Report of the Secretary-General on Children and armed conflict*, UN Doc. A/80/723-S/2026/357, ¶ 73 (Jun. 16, 2026), https://docs.un.org/en/A/80/723 (providing data on the attacks against and military use of 235 schools); OCHA, *Haiti: Nationwide Humanitarian Response Situation Report No. 1 – 1 February – 31 March 2026* (Apr. 10, 2026), https://www.unocha.org/publications/report/haiti/haiti-overview-humanitarian-response-national-level-situation-report-no-1-february-march-2026 ("Children . . . are among the most vulnerable, facing heightened risks of . . . school drop-out.").

[363] IOM, *Displacement situation in Haiti as of August 2026—Round 14*, p. 14 (Sep. 23, 2026), https://reliefweb.int/attachments/48fe6337-3f91-5db4-b13f-90bbfa07bed9/Displacement%20situation%20in%20Haiti%20-%20Round%2014%20-%20August%202026_0.pdf ("Among IDPs living in sites in the capital, 40 per cent reside in schools, representing 81,547 individuals across 36 schools."); Christina Silveiro, *Back to school in Haiti: 'Madame, can you stop what the gangs are doing to us?'*, UN News (Sep. 15, 2026), https://news.un.org/en/story/2026/09/1168337; Le Placentin, *Rentrée scolaire : Plus de 15 écoles nationales sans locaux à Port-au-Prince* (Sep. 12, 2026), https://www.leplacentin.com/public/post/12-09-2026-rentree-scolaire-plus-de-15-ecoles-nationales-sans-locaux-a-port-au-prince (more than 15 of the 200 national schools in Port-au-Prince were forced to abandon their premises due to armed group violence and have been unable to successfully relocate; for example, the National School of the Republic of Paraguay "is no longer a school, it's a ghost school squatting in borrowed rooms" after armed groups from Carrefour-Feuilles forced its closure in 2024); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April – June 2026)*, pp. 9, 18 (Aug. 25, 2026),

https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 ("Gang attacks against public and private buildings led to the suspension of numerous services and activities, particularly in the education and health sectors. . . . including [due to the destruction of] two schools."); IOM, *Haiti – Update on the displacement situation in spontaneous sites (June 2026)*, p. 4 (Jul. 12, 2026), https://dtm.iom.int/reports/haiti-update-displacement-situation-spontaneous-sites-june-2026?close=true (reporting that 37 Port-au-Prince schools are used as displacement sites); UN General Assembly & Security Council, *Report of the Secretary-General on Children and armed conflict*, UN Doc. A/80/723-S/2026/357 (Jun. 16, 2026), https://docs.un.org/en/A/80/723 (reporting 81 attacks on schools in 2025).

[364] Alterpresse, *Haïti-Crise : Une rentrée scolaire 2026 menacée par l'absence de dispositions étatiques, alerte l'Upeph* (Aug. 31, 2026), https://www.alterpresse.org/Haiti-Crise-Une-rentree-scolaire-2026-menacee-par-l-absence-de-dispositions-etatiques-alerte-l-Upeph ("In the West department, more than 400 schools were destroyed and 1,672 others closed out of 6,127 schools. Violence is preventing many schools from functioning in 8 communes in the West. In Artibonite, 7 communes are also paralyzed by gangs."); *see also* UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 22-23, 53, 57, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("In 2025, a total of 1,606, out of 18,241, schools remained closed across Haiti as a result of ongoing insecurity, depriving an estimated 243,000 students of access to education."); UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 15 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("Approximately one in seven children in Haiti is out of school, and an additional one million are at risk of dropping out.").

[365] Maye Primera, *'Nobody should be forced to return to Haiti': UN expert warns the island is unfit to receive deportees*, El País (Aug. 9, 2026), https://english.elpais.com/usa/2026-08-09/nobody-should-be-forced-to-return-to-haiti-un-expert-warns-the-island-is-unfit-to-receive-deportees.html; *see also* AlterPresse, *Haïti-Rentrée scolaire 2026-2027 : Le Rept appelle à des mesures fortes pour faire face aux défis* (Aug. 5, 2026), https://www.alterpresse.org/Haiti-Rentree-scolaire-2026-2027-Le-Rept-appelle-a-des-mesures-fortes-pour-faire-face-aux-defis (reporting on denunciation by the Education for All Group that more than 800,000 children are unable to attend school, especially those living in rural areas, disadvantaged neighborhoods, and areas affected by violence, as well as children with disabilities and working children).

[366] ICRC, *Haiti: Escalating armed violence in Port-au-Prince cuts people off from lifesaving services* (Apr. 2, 2026), https://www.icrc.org/en/article/haiti-escalating-armed-violence-cuts-people-off-lifesaving-services ("Routine activities – going to . . . to school - can put people at risk of stray bullets, forced recruitment, sexual violence or disappearance."); Christina Silveiro, *Back to school in Haiti: 'Madame, can you stop what the gangs are doing to us?'*, UN News (Sep. 15, 2026), https://news.un.org/en/story/2026/09/1168337 (one child's plea to a UNICEF representative to stop what the armed groups are doing to them "captured the reality confronting children across Haiti, where violence has . . . made even the simple act of going to class an act of courage").

[367] Le Facteur Haiti, *Haïti : Au moins 5 écoliers enlevés vendredi matin à Port-au-Prince* (Sep. 18, 2026), https://lefacteurhaiti.com/haiti-au-moins-5-ecoliers-enleves-vendredi-matin-a-port-au-prince/; Christina Silveiro, *Back to school in Haiti: 'Madame, can you stop what the gangs are doing to us?'*, UN News (Sep. 15, 2026), https://news.un.org/en/story/2026/09/1168337 ("[T]wo young girls were kidnapped on their way to school. It was the day after the school year began. . . . Such incidents cause enormous fear and anxiety among families . . . – to the point that some parents now hesitate to let their children travel alone.") (*internal quotations omitted*); IRC, *Families in Haiti Face Impossible Choices as Violence Surges and Public Services Collapse, IRC* Finds (Apr. 16, 2026), https://www.rescue.org/press-release/families-haiti-face-impossible-choices-violence-surges-and-public-services-collapse.

[368] IRC, *Families in Haiti Face Impossible Choices as Violence Surges and Public Services Collapse, IRC* Finds (Apr. 16, 2026), https://www.rescue.org/press-release/families-haiti-face-impossible-choices-violence-surges-and-public-services-collapse.

[369] Christina Silveiro, *Back to school in Haiti: 'Madame, can you stop what the gangs are doing to us?'*, UN News (Sep. 15, 2026), https://news.un.org/en/story/2026/09/1168337 ("A child who has been displaced or exposed to violence can hardly concentrate the way they used to. The teachers themselves may have fled their own neighborhoods or may no longer be able to reach their schools.").

[370] Le Placentin, *Rentrée scolaire : Plus de 15 écoles nationales sans locaux à Port-au-Prince* (Sep. 12, 2026), https://www.leplacentin.com/public/post/12-09-2026-rentree-scolaire-plus-de-15-ecoles-nationales-sans-locaux-a-port-au-prince (according to the Association of Directors of National Schools of Haiti, the forced closure and relocation of schools has resulted in "a drop in academic performance," with "[s]tudents . . . dropping out, tired of changing schools every term," and teachers unable to "cover all their classes, exhausted by the distances between the temporary classrooms and their homes;" in some schools, teachers have been forced to reduce "their attendance to two or three days a week"); *see also* Jude Pierre Louis, *'We cannot take it anymore': Haiti's informal vendors protest over gang warfare*, Global Voices (Sep. 27, 2026), https://globalvoices.org/2026/09/27/we-cannot-take-it-anymore-haitis-informal-vendors-protest-over-gang-warfare/ ("Private schools . . . cannot keep up with the demand.").

[371] Le Placentin, *Rentrée scolaire : Plus de 15 écoles nationales sans locaux à Port-au-Prince* (Sep. 12, 2026), https://www.leplacentin.com/public/post/12-09-2026-rentree-scolaire-plus-de-15-ecoles-nationales-sans-locaux-a-port-au-prince (reporting on government failures to support the sustainable relocation of schools forced to abandon their premises due to insecurity); Alterpresse, *Haïti-Crise : Une rentrée scolaire 2026 menacée par l'absence de dispositions étatiques, alerte l'Upeph* (Aug. 31, 2026), https://www.alterpresse.org/Haiti-Crise-Une-rentree-scolaire-2026-menacee-par-l-absence-de-dispositions-etatiques-alerte-l-Upeph (the Union of Progressive Haitian Parents of Students "denounces the government's inaction regarding measures to make the start of the school year effective, in this context of economic crisis and violence from armed gangs," and notes that "hundreds of destroyed public schools have not been rebuilt or repaired, despite government declarations," including 115 in the Southeast Department, 29 in the Grand'Anse Department, 27 in the Northwest Department, 26 in the Northeast Department, and 10 in the North Department); Rhinews, *Des syndicats d'enseignants dénoncent un « simulacre de concertation » sur la rentrée scolaire 2026-2027…* (Aug. 2, 2026), https://www.rhinews.com/culture-education/des-syndicats-denseignants-denoncent-un-simulacre-de-concertation-sur-la-rentree-scolaire-2026-2027/ (teachers' unions criticized the government for

failing to respond regarding to concerns about, *inter alia*, "the impact of insecurity on the functioning of the education system"); Chloe Bonnefil, *SDG 4 in Haiti: Global Partnerships Advancing Education*, The Borgen Project (Mar. 20, 2026), https://borgenproject.org/sdg-4-in-haiti/.

[372] Chloe Bonnefil, *SDG 4 in Haiti: Global Partnerships Advancing Education*, The Borgen Project (Mar. 20, 2026), https://borgenproject.org/sdg-4-in-haiti/ ("Less than one-quarter of schools are public institutions. . . . [A]pproximately 80% of primary schools are privately run."); Maryse Penette-Kedar & Blaise Francois Aridou, *Haiti's security depends on education. What will it take?*, Miami Herald (Sep. 11, 2026), https://www.miamiherald.com/opinion/op-ed/article317197229.html (describing general limitations on education in Haiti due to lack of free public schools).

[373] *See* Alterpresse, *Haïti-Crise : Une rentrée scolaire 2026 menacée par l'absence de dispositions étatiques, alerte l'Upeph* (Aug. 31, 2026), https://www.alterpresse.org/Haiti-Crise-Une-rentree-scolaire-2026-menacee-par-l-absence-de-dispositions-etatiques-alerte-l-Upeph ("For the 2026-2027 school year, directors of private schools, particularly religious ones, have reportedly increased fees by up to 50% and imposed significant sums for graduation ceremonies," despite laws in place to prevent such precipitous increases and "the deteriorating economic situation of the parents."); Christina Silveiro, *Back to school in Haiti: 'Madame, can you stop what the gangs are doing to us?'*, UN News (Sep. 15, 2026), https://news.un.org/en/story/2026/09/1168337 ("[T]he cost of schooling . . . weighs particularly heavily on those who depend on private institutions."); Jude Pierre Louis, *'We cannot take it anymore': Haiti's informal vendors protest over gang warfare*, Global Voices (Sep. 27, 2026), https://globalvoices.org/2026/09/27/we-cannot-take-it-anymore-haitis-informal-vendors-protest-over-gang-warfare/ ("[W]ith masses of people struggling to survive — even before the widespread gang violence — very few can pay [for private school]."); Chloe Bonnefil, *SDG 4 in Haiti: Global Partnerships Advancing Education*, The Borgen Project (Mar. 20, 2026), https://borgenproject.org/sdg-4-in-haiti/ ("Many families do not have the necessary resources to pay for a proper education, while the government does not provide them with the adequate tools to do so."); *see also* Maye Primera, *'Nobody should be forced to return to Haiti': UN expert warns the island is unfit to receive deportees*, El País (Aug. 9, 2026), https://english.elpais.com/usa/2026-08-09/nobody-should-be-forced-to-return-to-haiti-un-expert-warns-the-island-is-unfit-to-receive-deportees.html (the UN's independent expert on human rights in Haiti listed "prices" and "fees" as two factors contributing to disruptions in education for children).

[374] Alterpresse, *Haïti-Crise : Une rentrée scolaire 2026 menacée par l'absence de dispositions étatiques, alerte l'Upeph* (Aug. 31, 2026), https://www.alterpresse.org/Haiti-Crise-Une-rentree-scolaire-2026-menacee-par-l-absence-de-dispositions-etatiques-alerte-l-Upeph (the Union of Progressive Haitian Parents of Students says "[t]he government has not yet paid public sector employees," just days before the start of the school year); Rhinews, *Des syndicats d'enseignants dénoncent un « simulacre de concertation » sur la rentrée scolaire 2026-2027…* (Aug. 2, 2026), https://www.rhinews.com/culture-education/des-syndicats-denseignants-denoncent-un-simulacre-de-concertation-sur-la-rentree-scolaire-2026-2027/ ("[T]he unions said they were particularly concerned by the lack of [government] responses regarding several issues, including implementation of the January 20, 2025 Agreement, the situation of unpaid teachers, [and] working conditions in schools."); Rhinews, *Le CENEH et l'UNNOH dénoncent le non-respect de l'accord du 20 janvier 2025 et réclament des mesures urgentes en faveur des enseignants…* (Jul. 3, 2026), https://www.rhinews.com/culture-education/le-ceneh-et-lunnoh-denoncent-le-non-respect-de-laccord-du-20-janvier-2025-et-reclament-des-mesures-urgentes-en-faveur-des-enseignants/; Maye Primera, *'Nobody should be forced to return to Haiti': UN expert warns the island is unfit to receive deportees*, El País (Aug. 9, 2026), https://english.elpais.com/usa/2026-08-09/nobody-should-be-forced-to-return-to-haiti-un-expert-warns-the-island-is-unfit-to-receive-deportees.html (the UN's independent expert on human rights in Haiti says "[t]eachers are not paid, they are at risk and some have been killed").

[375] *See, e.g.*, Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees ("The Trump administration's actions acknowledge that the removal of these humanitarian [TPS] protections is at odds with the security situation on the ground."); Edward Helmore, *First deportation flight lands in Haiti after TPS suspension*, The Guardian (Aug. 21, 2026), https://www.theguardian.com/us-news/2026/aug/21/haiti-deportation-tps ("Krish O'Mara Vignarajah, president and CEO of the immigrant-serving non-profit Global Refuge, said that it was a 'stunning contradiction' that an administration that advises Americans against all travel to Haiti would 'compel hundreds of thousands of Haitians into such dire circumstances is an unconscionable abdication of our moral responsibility.'"); *see also* HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives ("On August 30, the White House 'border czar,' Tom Homan, defended the deportations while admitting that he was unfamiliar with conditions in Haiti. 'I don't know the conditions in Haiti. I have never been in Haiti,' he told CNN, adding that the administration was 'just enforcing the law.'"); IACHR, *United States: IACHR expresses concern over the termination of Temporary Protected Status for Haitian Nationals* (Aug. 24, 2026), https://www.oas.org/es/CIDH/jsForm/?File=/en/iachr/media_center/PReleases/2026/171.asp (the IACHR "calls on the United States to ensure international protection when there are substantial grounds to believe that [Haitian TPS holders'] . . . return to Haiti would expose them to a serious risk of violations of their rights to life or personal integrity, as well as to guarantee access to procedures to identify and address such risks"); Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("Despite these conditions, the United States is proceeding with terminating Temporary Protected Status (TPS) for over 330,000 Haitians, putting them at risk of deportation. Haiti is not a safe place to deport people to. Upon arrival in Haiti, returnees would face a country where massacre is normalized."); David Nakamura, Maria Sacchetti & Arelis R. Hernández, *TPS for Haitians officially ends, putting thousands out of work and in limbo*, Washington Post (Aug. 5, 2026), https://www.washingtonpost.com/immigration/2026/08/05/tps-haitians-officially-ends-putting-thousands-out-work-limbo/ ("'This is an embarrassment for the United States of America,' Sen. Chris Murphy (D-Connecticut) said in a conference call with reporters Monday. 'There is no safe place to return for TPS holders from places like Haiti and Yemen and Venezuela and Syria. In fact, in those places I just mentioned, the situation is not stabilizing, getting better, it is getting worse.'"); HRW, *US: Haitians Set to Lose Protections, Risk Return to Violence* (Jul. 2, 2026), https://www.hrw.org/news/2026/07/02/us-haitians-set-to-lose-protections-risk-return-to-violence ("Deporting Haitians to Haiti would mean returning them to one of the world's most severe human rights and humanitarian crises."); Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis,*

experts say, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html (immigration attorney Ira Kurzban, who was involved in the litigation around TPS for Haitians, discusses the impacts of TPS cancellation on the U.S. healthcare system and describes the decision to terminate as "just another example of this administration engaged in self-destruction").

[376] University Network for Human Rights et al., *Briefing to IACHR re Haiti TPS Termination*, pp. 6, 9, 10-11 (Sep. 8, 2026) (on file with authors) (discussing racial discrimination in U.S. and Dominican migration policies targeting Haitians); Mullin v. Doe, 609 U.S. ___ (2026), Kagan dissenting, https://supreme.justia.com/cases/federal/us/609/25-1083/ (the dissent in the Supreme Court case that paved the way for the Trump administration to terminate TPS for Haitians noted that statements that President Trump made about Haitians are "so repellent and racially inflected that the majority declines to put them in print," and that they "fairly shout, in their racial undertones and overtones alike, that race entered into the President's resolve to remove Haitians from this country"); Associated Press, *Judge blocks Trump administration from ending protections for Haitians* (Feb. 3, 2026), https://www.npr.org/2026/02/03/g-s1-108463/judge-blocks-ending-protections-haitians (in a February 2026 opinion, U.S. district judge Ana Reyes found that it was "substantially likely" that the Trump administration was attempting to terminate TPS for Haitians due to "hostility to nonwhite immigrants"); Ohio Immigrant Alliance, *New Report: Detention of Haitian-Ohioans Rose 142% in Four Jails Since TPS Ended* (Sep. 17, 2026), https://ohioimmigrant.org/blog/2026/9/17/haitian-ohioan-detentions-142-percent (a staff attorney with Haitian Bridge Alliance (**HBA**) who interviewed Haitians held at Butler County Jail in August 2026 said "they had been targeted as part of one of the largest de-documentation-and-mass-deportation campaigns in history — historically rooted, racist and xenophobic in nature — all while the local jails and their jurisdictions profit from the ongoing detentions, all while the federal government is trying to figure out a way to return them to Haiti, and all while they have a pending request for humanitarian protection") (*internal quotations omitted*); Jacqueline Charles & Gérard Maxineau, *Deportation flight delays, ICE's last-minute adds leave Haitian officials scrambling*, Miami Herald (Sep. 11, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317199306.html (according to HBA executive director Guerline Josef, "[a]t this point, it is clear that extreme cruelty and the disregard for the lives of Haitian immigrants is an integral part of this [Trump] administration fulfillment of project 2025 to eliminate as many Black people as a part of their ethnic cleansing agenda") (*internal quotations omitted*); David Nakamura, Maria Sacchetti & Arelis R. Hernández, *TPS for Haitians officially ends, putting thousands out of work and in limbo*, Washington Post (Aug. 5, 2026), https://www.washingtonpost.com/immigration/2026/08/05/tps-haitians-officially-ends-putting-thousands-out-work-limbo/ (Katie Kersh, senior attorney with Advocates for Basic Legal Equality, says "[t]he way this group has been specifically targeted is symbolic of the administration's efforts to criminalize immigrants of color") (*internal quotations omitted*); Haiti Libre, *Haïti : Le Garr dénonce le traitement « inhumain » infligé à un migrant haïtien en République Dominicaine* (Jul. 26, 2026), https://www.alterpresse.org/Haiti-Le-Garr-denonce-le-traitement-inhumain-inflige-a-un-migrant-haitien-en-Republique-dominicaine (the Support Group for Repatriates and Refugees (**GARR**) "denounces what it considers to be 'racist' and 'xenophobic' migration policies targeting Haitian migrants in the Dominican Republic").

[377] Nathalye Cotrino, *"They Will Kill Me": Haitian Deportees from U.S. Face Fear, Uncertainty*, Just Security (Sep. 16, 2026), https://www.justsecurity.org/157194/haitian-deportees-face-fear-uncertainty/ (HRW's Nathalye Cotrino says deporting Haitian TPS holders "is not only a moral failing on the part of the United States," but "may violate international and domestic law"); GARR, *Un vol de déportation vers Haïti tourné au cauchemar : le GARR dénonce les conditions de déportations des ressortissants haïtiens* (Sep. 11, 2026), https://garrhaiti.org/2026/09/11/un-vol-de-deportation-vers-haiti-tourne-au-cauchemar-le-garr-denonce-les-conditions-de-deportations-des-ressortissants-haitiens/ ("US authorities . . . refuse to treat migrants humanely and . . . continually worsen their situation by acting outside the framework of protection, in total denial of their fundamental rights."); Haiti Libre, *The UN calls for an investigation into the deaths of migrants in US detention and demands a halt to deportations to Haiti* (Sep. 9, 2026), https://www.haitilibre.com/en/news-48402-the-un-calls-for-an-investigation-into-the-deaths-of-migrants-in-us-detention-and-demands-a-halt-to-deportations-to-haiti.html ("Volker Türk, the UN High Commissioner for Human Rights. . . . demanded the immediate suspension of deportations to countries where migrants risk serious harm, explicitly citing Haiti. He stated that any deportation to a third country must be subject to rigorous due process and cannot be carried out if there is a risk of irreparable harm."); Yvette D. Clarke, *Clarke and Pressley, Co-chairs of the Haiti Caucus, condemn deportation and dehumanization of Haitian nationals* (Aug. 31, 2026), https://clarke.house.gov/clarke-and-pressley-co-chairs-of-the-haiti-caucus-condemn-deportation-and-dehumanization-of-haitian-nationals/ (U.S. Representatives Yvette Clarke and Ayanna Pressley condemned the unjust termination of TPS, deportations of Haitian TPS holders, and "the vicious dehumanization of their communities"); Arelis R. Hernández, *ICE begins deporting Haitians who lost TPS back to homeland*, Washington Post (Aug. 20, 2026), https://www.washingtonpost.com/immigration/2026/08/20/ice-begins-deporting-haitians-who-lost-tps-back-homeland/ (Human Rights First's Savi Arvey expresses concern that the Trump administration "seems poised to intentionally take legal status from people in service of its mass deportation campaign and intentionally and knowingly deporting people to danger"); Stephen Starr, *In Ohio, Haitians' American dream shatters as ICE prepares to deport them*, The Guardian (Aug. 12, 2026), https://www.theguardian.com/us-news/2026/aug/12/ohio-haitian-immigrants-ice (an activist protesting U.S. immigration officials' targeting of Haitians for deportation said their use of ankle monitors is "reminiscent of the shackles used during slavery, something the Haitian people are very familiar with, after liberating themselves from slavery in the late 18th century," and that they "send a message to all immigrants that they will always continue to be subjected to the violence of our punitive immigration system"); Maye Primera, *'Nobody should be forced to return to Haiti': UN expert warns the island is unfit to receive deportees*, El País (Aug. 9, 2026), https://english.elpais.com/usa/2026-08-09/nobody-should-be-forced-to-return-to-haiti-un-expert-warns-the-island-is-unfit-to-receive-deportees.html (the UN's independent expert on human rights in Haiti said forced repatriations to Haiti "violate[] international law and, morally, it is terrible to send people back into this situation"); Tim Padgett, *Is it a human rights violation to deport Haitian TPS holders to a cauldron of gang violence?*, WLRN (Jul. 28, 2026), https://www.wlrn.org/immigration/2026-07-28/haiti-deportation-human-rights ("Rights advocates fear the U.S. plans to deport Haitians are a violation of non-refoulement, the international law principle that prohibits forcing refugees back to a place they'll likely be harmed if not killed."); Center for Migration Studies, *The Center for Migration Studies Condemns the Termination of TPS for Haitians and Syrians* (Jul. 27, 2026), https://cmsny.org/tps-termination-haiti-syria/ ("Sending back Haitians and Syrians to unstable and dangerous conditions in their home countries is not simply a legal issue for our nation, but a moral one."); HRW, *US: Haitians Set to Lose Protections, Risk*

Return to Violence (Jul. 2, 2026), https://www.hrw.org/news/2026/07/02/us-haitians-set-to-lose-protections-risk-return-to-violence.

[378] Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html ("[H]undreds [of Haitians] have taken to the sea, just in the first six months of this year, only to be intercepted and forcibly returned to Haiti."); Jacqueline Charles, *Dangerously overcrowded boat with 240 Haitians intercepted near Turks & Caicos*, Miami Herald (Jun. 5, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316018833.html (describing "continued forced deportations from neighboring countries," including the United States, the Dominican Republic, the Bahamas, and Turks and Caicos); *see also, e.g.*, Hamed Aleaziz, Zolan Kanno-Youngs & Frances Robles, *Trump Administration to Expand Deportation Flights to Haiti*, New York Times (Aug. 27, 2026), https://www.nytimes.com/2026/08/27/us/politics/haiti-deportation-flights.html (reporting on two deportation flights from the United States and the Bahamas that arrived in Cap-Haïtien on August 27, 2026).

[379] *See, e.g.*, U.S. Mission to the UN, *Remarks Following the Adoption of UN Security Council Resolution to Renew the Gang Suppression Force Mandate* (Sep. 29, 2026), https://usun.usmission.gov/remarks-following-the-adoption-of-a-un-security-council-resolution-to-renew-the-gang-suppression-force-mandate/ (U.S. Ambassador to the UN Mike Waltz "the gangs have taken over," while Haitian institutions had grown weaker and ordinary people in Haiti "have paid the price"); Presidencis de la República Dominicana, *Presidente Luis Abinader llama ante la ONU pasar de las decisiones a la acción frente a crisis de Haití y afirma que la República Dominicana ha hecho su parte* (Sep. 23, 2026), https://www.presidencia.gob.do/noticias/presidente-luis-abinader-llama-ante-la-onu-pasar-de-las-decisiones-la-accion-frente-crisis (Dominican President Luis Abinader says "transnational criminal networks control territories, traffic weapons and people, and recruit children," with Haiti "the clearest example") (*internal quotations omitted*); *see also* Amnesty International, *Haiti: Attack in Artibonite underscores the urgent need to turn international commitments into effective protection* (Sep. 30, 2026), https://www.amnesty.org/en/latest/news/2026/09/haiti-ataque-en-artibonite-demuestra-la-urgencia-de-convertir-los-compromisos-internacionales-en-proteccion-efectiva/ (Amnesty International's Americas Director noted the "profound inconsistency when governments such as those of the Dominican Republic and the United States call at the United Nations for a stronger international response to protect the Haitian population, while continuing to carry out collective deportations to Haiti amid this devastating human rights and security crisis. . . . Governments cannot tell the United Nations that Haiti is facing an emergency requiring extraordinary action while, at the same time, sending people back to face those very same dangers.") (*internal quotations omitted*).

[380] UN, Meetings Coverage, Security Council, *Kenscoff Massacre Exposes Worsening Brutality of Haiti's Gang Crisis, Security Council Hears, as Speakers Urge Rapid International Support* (Aug. 28, 2026), https://press.un.org/en/2026/sc16444.doc.htm; *see also* IOM, *Monthly monitoring of forced returns to Haiti – June 2026* (Jun. 30, 2026), https://dtm.iom.int/reports/haiti-monthly-monitoring-forced-returns-abroad-haiti-june-2026 (reporting 141,720 Haitians deported in the first six months of 2026 compared with 127,909 in the first six months of 2025); Gerard Maxineau & Dánica Coto, *First group of deportees arrives in troubled Haiti after US ends TPS program*, Associated Press (Aug. 20, 2026) https://apnews.com/article/haiti-us-deported-flight-tps-trump-e3b4e8aaffb70c3a962721fcce11b89b; Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("Groupe d'Appui aux Rapatriés et Réfugiés [GARR], Haiti's leading organization supporting returnees, reported that more than 68,000 Haitians were deported back to the country in just the first three months of 2026, surpassing the 55,000 recorded during the same time period in 2025."); *see also* IOM, *Haiti's Displacement Crisis Hits Record 1.5 Million Amid Escalating Violence* (Jun. 5, 2026), https://www.iom.int/news/haitis-displacement-crisis-hits-record-15-million-amid-escalating-violence (reporting more than 110,000 Haitians forcibly returned to Haiti since January 2026).

[381] IOM, *Monthly monitoring of forced returns to Haiti – June 2026* (Jun. 30, 2026), https://dtm.iom.int/reports/haiti-monthly-monitoring-forced-returns-abroad-haiti-june-2026 (of the 141,720 Haitians deported between January and June 2026, the Dominican Republic was responsible for 140,018); IOM, *Monthly monitoring of forced returns to Haiti – May 2026* (May 31, 2026), https://dtm.iom.int/fr/reports/haiti-monthly-monitoring-forced-returns-abroad-haiti-may-2026; IOM, *Monthly monitoring of forced returns to Haiti – April 2026* (Apr. 30, 2026), https://dtm.iom.int/reports/haiti-monthly-monitoring-forced-returns-abroad-haiti-april-2026; IOM, *Monthly monitoring of forced returns to Haiti – March 2026* (Mar. 31, 2026), https://dtm.iom.int/reports/haiti-monthly-monitoring-forced-returns-haiti-march-2026; *see also* Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("Although most of these deportations came from the Dominican Republic, deportations from the U.S. are expected to rise."); Jacqueline Charles, *Aid cuts forcing women's groups worldwide to close. In Haiti, they are feeling the toll*, Miami Herald (Jul. 10, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316461717.html ("The crisis is being compounded by deportations to Haiti, particularly from the neighboring Dominican Republic, where humanitarian partners report as man as 700 forced returns a day."). The Dominican government's own numbers are even higher, reporting over 190,000 repatriations in the first half of 2026. Dominican Republic General Directorate of Migration (**DGM**), *In June, the DGM deported 34,226 undocumented immigrants with the support of the Armed Forces and National Police.* (Jul. 1, 2026), https://migracion.gob.do/en/in-june-the-dgm-deported-34226-undocumented-immigrants-with-the-support-of-the-armed-forces-and-national-police/ (further reporting the total number of repatriations since October 1, 2024 as 670,500); *see also* Lucnise Duquereste & Djouly Mombrun, *Employers steal the wages of Haitian migrants in the Dominican Republic*, AyiboPost (May 13, 2026), https://ayibopost.com/employers-steal-the-wages-of-haitian-migrants-in-the-dominican-republic/ (according to Dominican authorities, "525,000 foreigners, mostly Haitians, have been deported to Haiti" since October 2025); Haiti Libre, *Haiti - News : Zapping...* (Aug. 30, 2026), https://www.haitilibre.com/en/news-48333-haiti-news-zapping.html (according to the DGM, Dominican authorities deported 2,306 Haitians over just two days in late August).

[382] Haiti Libre, *Haïti : Le Garr dénonce le traitement « inhumain » infligé à un migrant haïtien en République Dominicaine* (Jul. 26, 2026), https://www.alterpresse.org/Haiti-Le-Garr-denonce-le-traitement-inhumain-inflige-a-un-migrant-haitien-en-Republique-dominicaine (GARR, discussing an incident in which agents of the DGM transported a "barefoot and visibly terrified" Haitian national on a motorcycle, described the abuse as "yet another example of the human rights violations regularly suffered by

Haitian migrants in the Dominican Republic" and part of a "recurring" practice during migration control operations in the country); Alterpresse, *Haïti-Migration : Plus de 21 mille Haïtien.ne.s expulsé.e.s de la République Dominicaine et 133 autres des États-Unis* (Jun. 9, 2026), https://www.alterpresse.org/Migration-Plus-de-21-mille-Haitiens-expulses-de-la-Republique-Dominicaine-et-133-autres-des-Etats-Unis (describing the deportations as "marked by violations of the fundamental rights of Haitian nationals" and affecting "several vulnerable groups," including pregnant women, children, and persons with disabilities); Jacqueline Charles & Syra Oriz Blanes, *As deportation flight lands in Haiti, U.S. says two planeloads a week will start soon*, Miami Herald (Jul. 16, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316530874.html (reporting that deportations are often carried out in "in miserable conditions").

[383] Global Detention Project, *Dominican Republic*, https://www.globaldetentionproject.org/countries/americas/dominican-republic#country-updates (last visited Oct. 20, 2026) ("Many undocumented migrants are detained in "reception centres" such as the notorious Centro de Retencion Haina where observers have decried deplorable conditions including overcrowding, abusive treatment, and corruption.").

[384] Alterpresse, *Haïti-Migration : Plus de 21 mille Haïtien.ne.s expulsé.e.s de la République Dominicaine et 133 autres des États-Unis* (Jun. 9, 2026), https://www.alterpresse.org/Migration-Plus-de-21-mille-Haitiens-expulses-de-la-Republique-Dominicaine-et-133-autres-des-Etats-Unis ("many migrants were victims of beatings and tear gas").

[385] *See, e.g.*, Alterpresse, *Haïti-Migration : Plus de 21 mille Haïtien.ne.s expulsé.e.s de la République Dominicaine et 133 autres des États-Unis* (Jun. 9, 2026), https://www.alterpresse.org/Migration-Plus-de-21-mille-Haitiens-expulses-de-la-Republique-Dominicaine-et-133-autres-des-Etats-Unis (reporting that 217 unaccompanied minors were among those deported in April 2026).

[386] *See, e.g.*, Alterpresse, *Haïti-Migration : Plus de 21 mille Haïtien.ne.s expulsé.e.s de la République Dominicaine et 133 autres des États-Unis* (Jun. 9, 2026), https://www.alterpresse.org/Migration-Plus-de-21-mille-Haitiens-expulses-de-la-Republique-Dominicaine-et-133-autres-des-Etats-Unis ("Pregnant and breastfeeding Haitian migrant women continue to be hunted down, expelled from hospitals and taken to detention centers, which are completely unsuitable for their conditions;" Dominican authorities deported 96 pregnant women and 237 breastfeeding women in April 2026); Saturnino Pérez, *Dignity in the Midst of Fear: The Reality of Haitian Migrant Families in the Dominican Republic*, Christian Reformed Church (Jun. 15, 2026), https://www.crcna.org/do-justice/dignity-midst-fear-reality-haitian-migrant-families-dominican-republic (the Organización para el Desarrollo y la Acción Humanitaria describes how a new mother "could be deported with her baby a few days after delivery, putting her recovery and the health of the newborn at serious risk;" the fear of deportation "can push people to make extreme choices or avoid essential services," resulting in home births without "adequate hygienic conditions, basic equipment, or sufficient medical accompaniment. . . . [and] in contexts of great precariousness"); Jacqueline Charles, *Haiti, Dominican Republic resume talks, flights after months of quiet diplomacy*, Miami Herald (Apr. 21, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article315475671.html (reporting an increase in "the number of deportations to Haiti, including that of pregnant women and those who recently gave birth"); *see also* UNFPA, *Situation Report, Haiti: Displacement from escalation in gang violence, 1 July - 31 August 2026*, p. 2 (Sep. 2026), https://www.unfpa.org/resources/situation-report-crisis-haiti-july-august-2026 (among those returned from the Dominican Republic are "families, pregnant and breastfeeding women, children, older persons, persons with disabilities and people with urgent medical or protection needs"); OCHA, *Haiti Humanitarian Bulletin March - May 2026*, p. 6 (Jul. 13, 2026), https://reliefweb.int/report/haiti/ocha-haiti-humanitarian-bulletin-march-may-2026 (IOM registered over 2,900 postpartum women and over 5,000 children under the age of five who had been returned to the border towns of Belladère and Ouanaminthe as of March 2026); Saturnino Pérez, *Dignity in the Midst of Fear: The Reality of Haitian Migrant Families in the Dominican Republic*, Christian Reformed Church (Jun. 15, 2026), https://www.crcna.org/do-justice/dignity-midst-fear-reality-haitian-migrant-families-dominican-republic ("According to community testimonies, a migrant woman suffered a wound to her foot and did not go to the hospital for fear of being deported. The wound became infected, the infection progressed to compromise the bone and, finally, the situation led to her death.").

[387] Haiti Libre, *Haïti : Le Garr dénonce le traitement « inhumain » infligé à un migrant haïtien en République Dominicaine* (Jul. 26, 2026), https://www.alterpresse.org/Haiti-Le-Garr-denonce-le-traitement-inhumain-inflige-a-un-migrant-haitien-en-Republique-dominicaine (according to GARR, the Dominican government's "racist and xenophobic migration policies. . . . foster a climate in which abuses can be committed without their perpetrators being systematically punished," with "Dominican authorities often . . . downplay[ing] the facts and present[ing] the victims of mistreatment as responsible for the acts of aggression they suffer") (*internal quotations omitted*).

[388] Lucnise Duquereste & Djouly Mombrun, *Employers steal the wages of Haitian migrants in the Dominican Republic*, AyiboPost (May 13, 2026), https://ayibopost.com/employers-steal-the-wages-of-haitian-migrants-in-the-dominican-republic/ (a Haitian living in the Dominican Republic "said he was forced to pay 12,000 pesos in July 2025 to secure his release after being detained by a [migration] patrol in the Bávaro area").

[389] Lucnise Duquereste & Djouly Mombrun, *Employers steal the wages of Haitian migrants in the Dominican Republic*, AyiboPost (May 13, 2026), https://ayibopost.com/employers-steal-the-wages-of-haitian-migrants-in-the-dominican-republic/ (according to testimonies collected by AyiboPost, Haitian workers are often not paid their wages or underpaid and then threatened with immigration consequences when they protest these and other abuses; the practice is particularly prevalent among construction site managers, who reportedly collude with migration agents).

[390] ONM, *Note de presse: rapatriement du 7e contingent des ressortissants Haïtiense n provenance des États-Unis* (Oct. 1, 2026), https://onm.gouv.ht/note-de-presse-rapatriement-du-7%E1%B5%89-contingent-des-ressortissants-haitiens-en-provenance-des-etats-unis/ (reporting the 7th deportation flight from the United States to Haiti since the cancellation of TPS, carrying 88 returnees); Frances Robles, *Deported From the U.S., Some Haitians Are Left Broke and Stranded*, New York Times (Sep. 6, 2026), https://www.nytimes.com/2026/09/06/world/americas/haiti-deportees.html; Hamed Aleaziz, Zolan Kanno-Youngs & Frances Robles, *Trump Administration to Expand Deportation Flights to Haiti*, New York Times (Aug. 27, 2026), https://www.nytimes.com/2026/08/27/us/politics/haiti-deportation-flights.html ("The flights are expected to continue weekly in the near term, though a U.S. official cautioned that the plans were still being finalized."); *see also* Alexandra Villarreal, *Haitians face*

arrest and deportation after US removes TPS protections, The Guardian (Aug. 7, 2026), https://www.theguardian.com/us-news/2026/aug/07/haitians-us-deportation-tps-immigration (according to the Transactional Records Access Clearinghouse, "removal orders for Haitians in the immigration courts have soared by 96% between March and June"); X, ICE Flight Monitor, @ICEFlightM (Sep. 10, 2026), https://x.com/ICEFlightM/status/2098048515217732082?s=20 (reporting on the fouth deportation flight to Cap-Haïtien in as many weeks); Jacqueline Charles & Gérard Maxineau, *U.S. sends another deportation flight to Haiti. A former Haitian official is aboard*, Miami Herald (Sep. 4, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317112606.html (the third deportation flight in as many weeks landed in Cap-Haïtien on September 3, 2026, carrying 85 people); Jacqueline Charles & Gérard Maxineau, *ICE sends second deportation flight to Haiti in a week. There are kids aboard*, Miami Herald (Aug. 28, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317024904.html (two deportation flights from the United States landed in Cap-Haïtien, Haiti, in one week in late August; 218 individuals were on board, "including several children born in the U.S. and Brazil"); Sarah Davis, *ICE begins deporting Haitians who lost temporary protections*, The Hill (Aug. 21, 2026), https://thehill.com/homenews/administration/6043476-ice-first-haiti-deportation-flight/ (the first deportation flight since the Trump administration's termination of TPS landed in Cap-Haïtien on August 20 and included former TPS holders).

[391] As of September 25, the United States has deported 529 Haitians since the termination of TPS in July 2026, bringing the total number of Haitians deported from the United States since January 2026 to 1,397. U.S. authorities have told Haitian migration officials to expect "as many as two deportation flights a week, each carrying approximately 200 people" – prior to the termination of TPS, "the United States had generally operated about one deportation flight to Haiti each month." HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives; Juhakenson Blaise, *US deports 530 to Haiti in month since TPS ended*, Haitian Times (Sep. 25, 2026), https://haitiantimes.com/2026/09/25/530-haitians-deported-in-six-deportation-flight/; *see also* Arelis R. Hernández, *ICE begins deporting Haitians who lost TPS back to homeland*, Washington Post (Aug. 20, 2026), https://www.washingtonpost.com/immigration/2026/08/20/ice-begins-deporting-haitians-who-lost-tps-back-homeland/ ("Many of the passengers [on the U.S. administration's first deportation flight since the TPS termination] had been detained by U.S. Immigration and Customs Enforcement in the last three weeks, and at least one had recently lost temporary protected status, according to Guerline Jozef of the Haitian Bridge Alliance. 'People are losing TPS status and losing their asylum cases,' she said. 'It's become easier and easier to be taken and deported.'"); Juhakenson Blaise, *US to Haiti: Expect weekly TPS holder deportation flights*, Haitian Times (Jul. 21, 2026), https://haitiantimes.com/2026/07/21/us-informs-haiti-of-upcoming-deportations/ ("'The U.S. Embassy informed us that there will be weekly deportation flights carrying a total of 250 or more Haitian migrants back to the country,' [Jean Négot Bonheur] Delva[, ONM director general] said. At that pace . . . Haiti could receive roughly 1,000 deportees every month from the U.S.").

[392] TPS offered relief based on a determination that conditions in Haiti would prevent nationals from returning safely or being adequately received. The U.S. government's initial order halting TPS was set to go into effect on February 3, 2026, but a federal judge ordered a stay pending the outcome of a lawsuit brought by five Haitian TPS holders, which the Supreme Court later consolidated with one brought on behalf of Syrian TPS holders. The Supreme Court issued its ruling on the consolidated case on June 25, 2026, (1) dismissing, based on insufficient evidence, the constitutional claim that the termination was racially motivated, and (2) holding that the TPS statute explicitly bars judicial review of non-constitutional challenges to a country's TPS termination. *See* U.S. Citizenship and Immigration Services (**USCIS**), *Temporary Protected Status*, https://www.uscis.gov/humanitarian/temporary-protected-status (last visited Oct. 6, 2026); Zach Schonfeld & Rebecca Beitsch, *Supreme Court allows Trump to terminate deportation protections for Haitians, Syrians*, The Hill (Jun. 25, 2026), https://thehill.com/regulation/court-battles/5940351-supreme-court-temporary-protected-status-trump-immigration/ (discussing the Supreme Court's June 25 decision); Devan Cole, Priscilla Alvarez & Tami Luhby, *Court confirms that temporary deportation protections for Haitians are no longer in place*, CNN (Aug. 5, 2026), https://www.cnn.com/2026/08/05/politics/haiti-temporary-deportation-protections-tps-no-longer-in-place (on August 5, 2026, U.S. district court Judge Ana Reyes lifted the original February 2026 injunction, bringing the lower court into compliance with the Supreme Court's June 25 decision); David Nakamura, Maria Sacchetti & Arelis R. Hernández, *TPS for Haitians officially ends, putting thousands out of work and in limbo*, Washington Post (Aug. 5, 2026), https://www.washingtonpost.com/immigration/2026/08/05/tps-haitians-officially-ends-putting-thousands-out-work-limbo/ (noting that "[t]he Supreme Court's ruling left open a narrow path for TPS holders to challenge the loss of their status on constitutional grounds").

[393] Nathalye Cotrino, *"They Will Kill Me": Haitian Deportees from U.S. Face Fear, Uncertainty*, Just Security (Sep. 16, 2026), https://www.justsecurity.org/157194/haitian-deportees-face-fear-uncertainty/; Alexandra Villarreal, *Haitians face arrest and deportation after US removes TPS protections*, The Guardian (Aug. 7, 2026), https://www.theguardian.com/us-news/2026/aug/07/haitians-us-deportation-tps-immigration ("Hundreds of thousands of Haitians are faced with the prospect of imminent risk of arrest and deportation. . . . [following] the controversial supreme court ruling in June that . . . opened the door for immigration enforcement to track down and detain Haitians en masse. . . . 'We're going after them right now,' the [Department of Homeland Security (**DHS**)] . . . secretary, Markwayne Mullin, said earlier this week. 'These individuals can either self-deport or we'll arrest you and send you back. It's that simple.'"); Mateo Moreno, *As Haiti Death Toll Tops 3,000, U.S. Prepares to Accelerate Deportation Flights*, Latin Times (Aug. 31, 2026), https://www.latintimes.com/haiti-death-toll-tops-3000-us-prepares-accelerate-deportation-flights-598861; *see also* Hamed Aleaziz, Zolan Kanno-Youngs & Frances Robles, *Trump Administration to Expand Deportation Flights to Haiti*, New York Times (Aug. 27, 2026), https://www.nytimes.com/2026/08/27/us/politics/haiti-deportation-flights.html (the administration is urging Haitians to self-deport, with a White House spokesperson saying that "[t]he federal courts have ordered the Haitian illegals must leave the U.S. and we have generously made free flights available") (*internal quotations omitted*); Maye Primera, *'Nobody should be forced to return to Haiti': UN expert warns the island is unfit to receive deportees*, El País (Aug. 9, 2026), https://english.elpais.com/usa/2026-08-09/nobody-should-be-forced-to-return-to-haiti-un-expert-warns-the-island-is-unfit-to-receive-deportees.html ("[M]ore than 50,000 U.S. children with dual nationality have at least one parent or guardian who is a beneficiary of such programs and therefore at risk of deportation. The removal of protections forces families to face impossible choices: separate the family, risk detention and deportation, or return to the island together. On every occasion in recent months when he has addressed the situation of children, the UN expert has said that Haiti is one of the worst places in the world to be a child.").

[394] According to an email exchange between USCIS officials, then-Secretary of Homeland Security Kristi Noem failed to consult with the State Department to evaluate country conditions in Haiti – as required under federal law – before announcing the cancellation of TPS for Haitians, and ignored USCIS recommendations for an automatic extension of Haiti's TPS. Syra Ortiz Blanes, *'Noem lied': Emails suggest DHS ignored federal law to end TPS for 350k Haitians*, Miami Herald (Jun. 17, 2026), https://www.miamiherald.com/news/local/immigration/article316161308.html; Hamed Aleaziz, Zolan Kanno-Youngs & Frances Robles, *Trump Administration to Expand Deportation Flights to Haiti*, New York Times (Aug. 27, 2026), https://www.nytimes.com/2026/08/27/us/politics/haiti-deportation-flights.html.

[395] The State Department lists Haiti as a "Level 4: Do Not Travel" country, citing "crime, terrorism, kidnapping, unrest, and limited health care." U.S. Department of State, *Haiti*, https://travel.state.gov/en/international-travel/travel-advisories/haiti.html (last visited Oct. 20, 2026); *see also* Alexandra Villarreal, *Haitians face arrest and deportation after US removes TPS protections*, The Guardian (Aug. 7, 2026), https://www.theguardian.com/us-news/2026/aug/07/haitians-us-deportation-tps-immigration ("'In a stunning contradiction, the administration advises Americans against all travel to Haiti – and instructs those who go anyway to draft a will and submit DNA samples so their remains can be identified,' said Krish O'Mara Vignarajah, president and CEO of the immigrant-serving non-profit Global Refuge. . . . 'That is the government's own assessment of the danger. To then compel hundreds of thousands of Haitians into such dire circumstances is an unconscionable abdication of our moral responsibility.'"); Mateo Moreno, *As Haiti Death Toll Tops 3,000, U.S. Prepares to Accelerate Deportation Flights*, Latin Times (Aug. 31, 2026), https://www.latintimes.com/haiti-death-toll-tops-3000-us-prepares-accelerate-deportation-flights-598861 (a Miami pastor who says his parishioners are afraid to leave their homes because of the administration's immigration crackdown ties their fear "directly to Washington's own travel guidance: the government tells Americans not to go to Haiti while sending Haitians back to it"); David Nakamura, Maria Sacchetti & Arelis R. Hernández, *TPS for Haitians officially ends, putting thousands out of work and in limbo*, Washington Post (Aug. 5, 2026), https://www.washingtonpost.com/immigration/2026/08/05/tps-haitians-officially-ends-putting-thousands-out-work-limbo/; Jacqueline Charles, *U.S. lawmaker who visited Haiti says conditions would be 'a disaster' for TPS returnees*, Miami Herald (Aug. 1, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316728244.html; Russel L. Honoré, *Haiti Is a War Zone. Why Are We Banishing Our Neighbors There?*, New York Times (Jul. 23, 2026), https://www.nytimes.com/2026/07/23/opinion/trump-haiti-tps-immigration.html?smid=nytcore-ios-share (Lt. Gen. Honoré, a former commanding general of the U.S. First Army, highlights the hypocrisy of the government's claim "that conditions in Haiti have stabilized enough for their [TPS holders'] return" while maintaining that the country is not safe for U.S. citizens).

[396] The new guidance applies to all areas identified in State Department travel advisories as "high-risk," including Haiti, and contains additional recommendations to draft a will, name insurance beneficiaries, and designate a family member as a point of contact and set up a proof-of-life protocol in case of kidnapping. Former State Department officials say the language on DNA samples and dental records, in particular, is unprecedented and reflects "a disjointed policy." Jacqueline Charles, *U.S. citizen traveling to Haiti? The State Department has an unusually grim request*, Miami Herald (Jul. 17, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316542444.html ("'The idea of leaving DNA samples and dental records demonstrates how outrageous it is that top Trump adviser Stephen Miller, President Donald Trump and Secretary of State Marco Rubio would consider sending people back to Haiti,' said Miami-immigration attorney Ira Kurzban, whose firm is part of the team that challenged the Department of Homeland's termination of Haiti's TPS designation. . . . Several [former State Department officials] reacted to the recommendation with adjectives like 'crazy' and 'wild.' One former official noted that the request is more commonly associated with U.S. troops deploying to combat zones.") (*internal quotations omitted*); U.S. Department of State, *High-Risk Areas*, https://travel.state.gov/en/international-travel/travel-advisories/high-risk-areas.html (last visited Oct. 20, 2026).

[397] In 2025, the Trump administration suspended all immigration applications for Haitians, including asylum; terminated humanitarian parole and family reunification programs; and added increased vetting for refugees admitted through the U.S. Refugee Admissions Program (**USRAP**). Although the immigration application suspension was vacated in August 2026 by a federal judge on the basis that it "was issued in excess of Secretary Rubio's statutory authority," (Catholic Legal Immigration Network, Inc. v. Rubio, No. 1:26-cv-00858 (S.D.N.Y. Aug. 21, 2026), https://fingfx.thomsonreuters.com/gfx/legaldocs/klvyowkelvg/08212026vargas.pdf), other policies to curb immigration remain in place or have been expanded. The quota for refugee resettlement through USRAP remains the lowest in history. In August 2026, U.S. officials announced the administration's latest attack on asylum: a plan to revoke non-immigrant visas of asylum-seekers in the United States, which could affect up to 200,000 foreigners with business and tourist visas. *See* Victoria Craw, *State Dept. to revoke tourist, business visas for those who claimed asylum*, Washington Post (Aug. 25, 2026), https://www.washingtonpost.com/immigration/2026/08/25/state-dept-revoke-tourist-business-visas-those-who-claimed-asylum/ (describing the administration's plan to revoke non-immigrant visas of asylum-seekers as "the latest tactic by President Donald Trump's administration to curb immigration;" the State Department "did not confirm the number of visas that could be revoked, saying it would be done on a rolling basis," and "did not say whether those who have visas revoked will be deported or what will happen to any pending asylum claims"); Associated Press, *Trump administration plans to revoke visas of 200,000 asylum seekers*, The Guardian (Aug. 24, 2026), https://www.theguardian.com/us-news/2026/aug/24/trump-administration-revoke-asylum-visas; Ximena Bustillo, *The Trump administration has undercut the U.S. asylum program. These 3 charts show how*, Houston Public Media (Jul. 31, 2026), https://www.houstonpublicmedia.org/articles/news/politics/immigration/2026/07/31/558345/trump-asylum-program-changes-charts/; HBA, *Haitian Bridge Alliance denounces new USCIS asylum rule undermining due process* (Jul. 28, 2026) (denouncing a new USCIS rule "implemented under the guise of reducing the asylum backlog. . . . [that] allows asylum officers to bypass key procedural steps and shift more cases into immigration court or removal proceedings, raising serious concerns about due process and access to justice"); Margy O'Herron, *How the Trump Administration Is Dismantling Refugee and Asylum Programs*, Brennan Center (Jul. 22, 2026), https://www.brennancenter.org/our-work/analysis-opinion/how-trump-administration-dismantling-refugee-and-asylum-programs; IRC, *Who decides how many refugees come to the US?* (Sep. 14, 2024), https://www.rescue.org/article/who-decides-how-many-refugees-come-us (last updated Jul. 17, 2026) (although the Trump

administration raised the quota for refugee resettlement in the United States for 2026 from 7,500 to 17,500 in May 2026, the additional 10,000 slots are "allocated solely to Afrikaners from South Africa, excluding many of the world's most vulnerable from access to protection"); Congressional Research Service, *U.S. Refugee Admissions Program in FY2025 and FY2026* (Jul. 28, 2026), https://www.congress.gov/crs-product/IF13277; *see also* IJDH, *Human Rights Update – March 2026*, notes 367-371 and associated text (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf; HIAS, *The Trump Administration's Alarming New Attacks on Refugees and Asylum-Seekers* (Dec. 5, 2025), https://hias.org/news/trump-administrations-alarming-new-attacks-refugees-and-asylum-seekers/; HRW, *US: Haitians Set to Lose Protections, Risk Return to Violence* (Jul. 2, 2026), https://www.hrw.org/news/2026/07/02/us-haitians-set-to-lose-protections-risk-return-to-violence (discussing generally the difficulties of applying for other forms of relief).

[398] *Cf.* Alexandra Villarreal, *Haitians face arrest and deportation after US removes TPS protections*, The Guardian (Aug. 7, 2026), https://www.theguardian.com/us-news/2026/aug/07/haitians-us-deportation-tps-immigration (noting that TPS holders "could endure deportation if they have not applied for another form of immigration relief, such as asylum in the US or a green card").

[399] *See* IJDH, *Human Rights Update – March 2026*, note 371 (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf.

[400] HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives (among those deported are individuals with pending asylum claims and applications for permanent residency based on marriage to a U.S. citizen); Jacqueline Charles & Gérard Maxineau, *ICE sends second deportation flight to Haiti in a week. There are kids aboard*, Miami Herald (Aug. 28, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317024904.html ("The flight arrived in Haiti amid ongoing gang attacks and a broader immigration crackdown by the Trump administration, which carried out nearly 50,000 immigration detentions in July. . . . Among the detentions are more than 7,000 arrests in Florida and 500 in Ohio, two states with populations of Haitians who previously had TPS. . . . No one appears to be immune — not individuals with asylum applications pending nor church leaders, two of whom were recently arrested by ICE in Springfield, Ohio. . . . This week dozens of Haitian migrants were taken to the Krome Detention Center in southwest Miami-Dade after being detained in front of grocery stores and shopping malls."); Arelis R. Hernández, *ICE begins deporting Haitians who lost TPS back to homeland*, Washington Post (Aug. 20, 2026), https://www.washingtonpost.com/immigration/2026/08/20/ice-begins-deporting-haitians-who-lost-tps-back-homeland/; David Nakamura, Maria Sacchetti & Arelis R. Hernández, *TPS for Haitians officially ends, putting thousands out of work and in limbo*, Washington Post (Aug. 5, 2026), https://www.washingtonpost.com/immigration/2026/08/05/tps-haitians-officially-ends-putting-thousands-out-work-limbo/.

[401] Ohio Immigrant Alliance, *Ice detention in Ohio after the Trump administration ended TPS for Haiti*, p. 2 (Sep. 17, 2026), https://static1.squarespace.com/static/68460a37f903140728c2ab29/t/6aac299a98f9422054ed704a/1789667741272/ICE+Detention+Trends+-+August+2026.pdf (exposing the Trump administration's lies about the necessity of ankle monitors to ensure court appearances); Miriam Jordan, *Haitian Student, Despondent Over Ankle Monitor, Dies in Apparent Suicide*, New York Times (Sep. 1, 2026), https://www.nytimes.com/2026/09/01/us/haiti-ankle-monitor-immigration-suicide.html (the family of a Haitian student and former TPS holder who died by suicide after being forced to wear an ankle monitor "says the electronic tracking device led Pierre Damas Bel, 20, to lose hope and take his life"); Jacqueline Charles, *Ankle monitor, loss of TPS blamed for Haitian college student's death*, Miami Herald (Sep. 1, 2026), https://www.miamiherald.com/news/local/immigration/article317089848.html; Alexandra Villarreal, *Haitians face arrest and deportation after US removes TPS protections*, The Guardian (Aug. 7, 2026), https://www.theguardian.com/us-news/2026/aug/07/haitians-us-deportation-tps-immigration ("[I]mmigration officials have started outfitting Haitians with ankle monitors to track their movements, making them easy to find and detain."); Miriam Jordan, *Haitian Student, Despondent Over Ankle Monitor, Dies in Apparent Suicide*, New York Times (Sep. 1, 2026), https://www.nytimes.com/2026/09/01/us/haiti-ankle-monitor-immigration-suicide.html (describing "an aggressive electronic monitoring campaign centered on Springfield[, Ohio]"); Jacqueline Charles & Gérard Maxineau, *ICE sends second deportation flight to Haiti in a week. There are kids aboard*, Miami Herald (Aug. 28, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317024904.html; Arelis R. Hernández, *ICE begins deporting Haitians who lost TPS back to homeland*, Washington Post (Aug. 20, 2026), https://www.washingtonpost.com/immigration/2026/08/20/ice-begins-deporting-haitians-who-lost-tps-back-homeland/; Julia Ainsley & Nathan Gonzalez, *Haitians in Ohio who lost protected status get ankle monitors instead of ICE detention*, NBC News (Aug. 13, 2026), https://www.nbcnews.com/politics/immigration/haitians-ohio-lost-protected-status-get-ankle-monitors-instead-ice-det-rcna591989; *see also* Amica Center for Immigrant Rights, *Lawsuit targets new ICE rule causing widespread harm through GPS monitoring* (Jun. 29, 2026), https://amicacenter.org/press-releases/lawsuit-targets-new-ice-rule-causing-widespread-harm-through-gps-monitoring/ (organizations suing ICE and the DHS over the agency's use of ankle and wrist GPS monitors without individualized justification say the policy is "inflicting serious [physical, psychological, and economic] harm on tens of thousands of immigrants across the country. . . . [who] have been subjected to intrusive and constant surveillance without meaningful review, explanation, or opportunity to challenge these conditions," and that "the new rule transforms a program meant to support release from detention into one that extends ICE's physical control of people's bodies into their homes, workplaces, and daily lives—without achieving one of the program's stated central goals of increasing court appearance rates").

[402] HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives (deportees described detention in "abusive conditions, including severe overcrowding, inadequate food, lack of sanitation, denial of adequate health care, difficulties obtaining medication or contacting relatives, and verbal and psychological mistreatment"); Ohio Immigrant Alliance, *Ice detention in Ohio after the Trump administration ended TPS for Haiti*, p. 5 (Sep. 17, 2026), https://static1.squarespace.com/static/68460a37f903140728c2ab29/t/6aac299a98f9422054ed704a/1789667741272/ICE+Detention+Trends+-+August+2026.pdf (finding that detentions of Haitian nationals in four immigration detention centers rose by over 142% in the months since TPS ended, with the rate of incarceration for Haitian women going up by nearly 2,000%); Ohio Immigrant Alliance, *New Report: Detention of Haitian-Ohioans Rose 142% in Four Jails Since TPS Ended* (Sep. 17, 2026), https://ohioimmigrant.org/blog/2026/9/17/haitian-ohioan-detentions-142-percent; HRW, *"You're Only Getting Out Deported or*

Dead" (Jul. 15, 2026), https://www.hrw.org/report/2026/07/15/youre-only-getting-out-deported-or-dead/abusive-us-immigration-detention-at-ft (individuals in immigration detention in El Paso, Texas, including Haitians, told HRW "they were rapidly moved through several detention centers without explanation, notice to attorneys, or the opportunity to inform family members of their whereabouts"); *see also* Haiti Libre, *The UN calls for an investigation into the deaths of migrants in US detention and demands a halt to deportations to Haiti* (Sep. 9, 2026), https://www.haitilibre.com/en/news-48402-the-un-calls-for-an-investigation-into-the-deaths-of-migrants-in-us-detention-and-demands-a-halt-to-deportations-to-haiti.html ("Volker Türk, the UN High Commissioner for Human Rights, called for a thorough investigation into the 23 migrant deaths that have occurred in US detention since the beginning of 2026.").

[403] HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives (deportees interviewed by HRW variously said they were never "explained the basis for their detention. . . . [,] their [asylum] claims were still pending at the time of their removal, and that they were unable to contact their lawyers or appear before an immigration judge before being deported"); Nathalye Cotrino, *"They Will Kill Me": Haitian Deportees from U.S. Face Fear, Uncertainty*, Just Security (Sep. 16, 2026), https://www.justsecurity.org/157194/haitian-deportees-face-fear-uncertainty/ (returnees who arrived in Haiti told HRW "they were detained shortly after their TPS ended and that the Department of Homeland Security's Immigration and Customs Enforcement (ICE) officers had not given them an opportunity to contact a lawyer, even when some said they had pending asylum cases"); Gerard Maxineau & Dánica Coto, *First group of deportees arrives in troubled Haiti after US ends TPS program*, Associated Press (Aug. 20, 2026) https://apnews.com/article/haiti-us-deported-flight-tps-trump-e3b4e8aaffb70c3a962721fcce11b89b (a Haitian deported from the United States to Haiti – who had been living in the United States since he was five years old – said, "ICE came and took me without questioning me") (*internal quotations omitted*).

[404] Nathalye Cotrino, *"They Will Kill Me": Haitian Deportees from U.S. Face Fear, Uncertainty*, Just Security (Sep. 16, 2026), https://www.justsecurity.org/157194/haitian-deportees-face-fear-uncertainty/; Jacqueline Charles & Gérard Maxineau, *Deportation flight delays, ICE's last-minute adds leave Haitian officials scrambling*, Miami Herald (Sep. 11, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317199306.html; GARR, *Un vol de déportation vers Haïti tourné au cauchemar : le GARR dénonce les conditions de déportations des ressortissants haïtiens* (Sep. 11, 2026), https://garrhaiti.org/2026/09/11/un-vol-de-deportation-vers-haiti-tourne-au-cauchemar-le-garr-denonce-les-conditions-de-deportations-des-ressortissants-haitiens/ (reporting "a sick person, a mother, and an infant" among passengers on a September 10 deportation flight); Jacqueline Charles & Gérard Maxineau, *U.S. sends another deportation flight to Haiti. A former Haitian official is aboard*, Miami Herald (Sep. 4, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317112606.html (a deportation flight that landed on September 3, 2026 carried a two-year-old U.S.-born child whose mother is Haitian); Mateo Moreno, *As Haiti Death Toll Tops 3,000, U.S. Prepares to Accelerate Deportation Flights*, Latin Times (Aug. 31, 2026), https://www.latintimes.com/haiti-death-toll-tops-3000-us-prepares-accelerate-deportation-flights-598861 (a deportation flight that landed in Cap-Haïtien was carrying "a 1-year-old U.S. citizen and other kids who'd been born stateside or in Brazil"); Jacqueline Charles & Gérard Maxineau, *ICE sends second deportation flight to Haiti in a week. There are kids aboard*, Miami Herald (Aug. 28, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317024904.html (a 3-year-old child born in the United States was among those deported from the United States in August 2026).

[405] GARR, *Un vol de déportation vers Haïti tourné au cauchemar : le GARR dénonce les conditions de déportations des ressortissants haïtiens* (Sep. 11, 2026), https://garrhaiti.org/2026/09/11/un-vol-de-deportation-vers-haiti-tourne-au-cauchemar-le-garr-denonce-les-conditions-de-deportations-des-ressortissants-haitiens/; Jacqueline Charles & Gérard Maxineau, *Deportation flight delays, ICE's last-minute adds leave Haitian officials scrambling*, Miami Herald (Sep. 11, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317199306.html ("[D]eportees had spent more than 13 hours in shackles, not including the flying time."); Frances Robles, *Deported From the U.S., Some Haitians Are Left Broke and Stranded*, New York Times (Sep. 6, 2026), https://www.nytimes.com/2026/09/06/world/americas/haiti-deportees.html (one returnee said "she and others . . . were shackled, even though she and several others had volunteered to be deported once it was clear they had no legal options remaining"); Jacqueline Charles & Gérard Maxineau, *U.S. sends another deportation flight to Haiti. A former Haitian official is aboard*, Miami Herald (Sep. 4, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317112606.html ("Last week, DHS posted a grainy, dark video of Haitian deportees in shackles and chains boarding an airplane in the rain, just days after gangs had carried out a massacre in Haiti. The footage was set to an upbeat Haitian song, its imagery prompting outrage and condemnation from Haitians and immigrant rights advocates."). According to Michelle Karshan, Executive Director of Alterative Chance/*Chans Altenativ*, returnees have complained about being shackled in their seats for upwards of fourteen hours when there are flight delays.

[406] Jacqueline Charles, *DHS boasts it returned gang leaders, sexual offenders to an unstable Haiti*, Miami Herald (Aug. 24, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316995309.html.

[407] GARR, *Un vol de déportation vers Haïti tourné au cauchemar : le GARR dénonce les conditions de déportations des ressortissants haïtiens* (Sep. 11, 2026), https://garrhaiti.org/2026/09/11/un-vol-de-deportation-vers-haiti-tourne-au-cauchemar-le-garr-denonce-les-conditions-de-deportations-des-ressortissants-haitiens/; *see also* Edward Helmore, *First deportation flight lands in Haiti after TPS suspension*, The Guardian (Aug. 21, 2026), https://www.theguardian.com/us-news/2026/aug/21/haiti-deportation-tps (recently returned migrants declined to speak to journalists filming their arrival, "with some indicating they fear being targeted by gangs").

[408] *Cf.* Gerard Maxineau & Dánica Coto, *First group of deportees arrives in troubled Haiti after US ends TPS program*, Associated Press (Aug. 20, 2026) https://apnews.com/article/haiti-us-deported-flight-tps-trump-e3b4e8aaffb70c3a962721fcce11b89b (according to GARR, many returnees "are experiencing family separation") (*internal quotations omitted*).

[409] Frances Robles, *Deported From the U.S., Some Haitians Are Left Broke and Stranded*, New York Times (Sep. 6, 2026), https://www.nytimes.com/2026/09/06/world/americas/haiti-deportees.html (describing some returnees as "penniless"); Jacqueline

Charles, *U.N. reports sharp rise in rapes in Haiti as country braces for end of TPS*, Miami Herald (Jul. 30, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316706875.html (according to the deputy spokesman for UN Secretary-General António Guterres, "[m]any return without identity documents or resources") (*internal quotations omitted*); OCHA, *Haiti Humanitarian Bulletin March - May 2026*, p. 5 (Jul. 13, 2026), https://reliefweb.int/report/haiti/ocha-haiti-humanitarian-bulletin-march-may-2026; Jacqueline Charles, *Dangerously overcrowded boat with 240 Haitians intercepted near Turks & Caicos*, Miami Herald (Jun. 5, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316018833.html (according to the IOM, "many arrive with no resources and limited support, often to communities already struggling to absorb new arrivals or to areas affected by armed group activity"); *see also* Edward Helmore, *First deportation flight lands in Haiti after TPS suspension*, The Guardian (Aug. 21, 2026), https://www.theguardian.com/us-news/2026/aug/21/haiti-deportation-tps ("[D]eportees from the US were reportedly given the equivalent of US$76.40 to get home – less than the price of a ticket to the Caribbean nation's capital Port-au-Prince from Cap-Haïtien but enough to get through some gang-controlled roads."); Gerard Maxineau & Dánica Coto, *First group of deportees arrives in troubled Haiti after US ends TPS program*, Associated Press (Aug. 20, 2026) https://apnews.com/article/haiti-us-deported-flight-tps-trump-e3b4e8aaffb70c3a962721fcce11b89b ("Immigration officials in Haiti on Thursday offered deportees a maximum of $65 and something to drink and eat."); Maye Primera, *'Nobody should be forced to return to Haiti': UN expert warns the island is unfit to receive deportees*, El País (Aug. 9, 2026), https://english.elpais.com/usa/2026-08-09/nobody-should-be-forced-to-return-to-haiti-un-expert-warns-the-island-is-unfit-to-receive-deportees.html.

[410] *See* Jacqueline Charles & Gérard Maxineau, *U.S. sends another deportation flight to Haiti. A former Haitian official is aboard*, Miami Herald (Sep. 4, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317112606.html (the acting UN assistant secretary-general for humanitarian affairs told the U.N. Security Council that many returnees "arrive without resources, documentation or support networks, and some have especially urgent protection needs, including survivors of sexual violence, pregnant and lactating women, people with disabilities, and unaccompanied and separated children"); UNFPA, *Situation Report, Haiti: Displacement from escalation in gang violence, 1 July - 31 August 2026*, p. 2 (Sep. 2026), https://www.unfpa.org/resources/situation-report-crisis-haiti-july-august-2026; Jacqueline Charles & Syra Oriz Blanes, *As deportation flight lands in Haiti, U.S. says two planeloads a week will start soon*, Miami Herald (Jul. 16, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316530874.html; OCHA, *Haiti Humanitarian Bulletin March - May 2026*, p. 6 (Jul. 13, 2026), https://reliefweb.int/report/haiti/ocha-haiti-humanitarian-bulletin-march-may-2026 (noting heightened protection risks for children and other vulnerable individuals, of which there are thousands).

[411] HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives ("Most said that property they had with them when detained, including clothing, jewelry, cash, identity documents and Haitian passports, mobile phones, and credit cards, was not returned to them upon their arrival. Haitian authorities responsible for receiving deportees said that deportees' belongings did not always arrive with them."); Nathalye Cotrino, *"They Will Kill Me": Haitian Deportees from U.S. Face Fear, Uncertainty*, Just Security (Sep. 16, 2026), https://www.justsecurity.org/157194/haitian-deportees-face-fear-uncertainty/ ("Some people recover their phones, clothes, or identity documents. Most get nothing back."); Jacqueline Charles & Gérard Maxineau, *Deportation flight delays, ICE's last-minute adds leave Haitian officials scrambling*, Miami Herald (Sep. 11, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317199306.html (according to immigrant advocates, "deportees have complained about missing money from their possessions following their ICE detentions"); Frances Robles, *Deported From the U.S., Some Haitians Are Left Broke and Stranded*, New York Times (Sep. 6, 2026), https://www.nytimes.com/2026/09/06/world/americas/haiti-deportees.html ("The department[of Homeland Security]'s statement said the deportees' personal property had been removed and secured while they were in custody and was returned upon arrival at Cap Haitien. . . . But several people who arrived on Thursday's flight said their phones, jewelry and even a $150 pair of sandals were gone. . . . Nathalye Cotrino, a senior researcher for the Americas division of Human Rights Watch, witnessed the arrival of two previous deportation flights in August. She said tensions soared when Haitian immigration officials distributed sealed white bags that contained the deportees' belongings. 'People were screaming: Where's my phone?! Where are my documents?' Ms. Cotrino said.") (*internal quotations omitted*).

[412] Caitlin Stephen Hu & Etant Dupain, *In the city where Haitian deportees are being sent, locals say they're not ready*, CNN (Aug. 21, 2026), https://www.cnn.com/2026/08/21/americas/haiti-ice-deporatations-cap-intl-latam; Mateo Moreno, *As Haiti Death Toll Tops 3,000, U.S. Prepares to Accelerate Deportation Flights*, Latin Times (Aug. 31, 2026), https://www.latintimes.com/haiti-death-toll-tops-3000-us-prepares-accelerate-deportation-flights-598861 (a deportation flight that landed in Cap-Haïtien was carrying "several passengers who had never set foot in Haiti but were sent there because a parent was Haitian — among them people born in Chile and the Dominican Republic"); Jacqueline Charles & Gérard Maxineau, *ICE sends second deportation flight to Haiti in a week. There are kids aboard*, Miami Herald (Aug. 28, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317024904.html (among those deported from the United States in August 2026 were a 3-year-old child born in the United States and a 25-year-old born in the Bahamas who had been living in the United States for over 20 years and said he "do[es]n't have any resources, family members or people to aid [him]" in Haiti) (*internal quotations omitted*); Edward Helmore, *First deportation flight lands in Haiti after TPS suspension*, The Guardian (Aug. 21, 2026), https://www.theguardian.com/us-news/2026/aug/21/haiti-deportation-tps; Gerard Maxineau & Dánica Coto, *First group of deportees arrives in troubled Haiti after US ends TPS program*, Associated Press (Aug. 20, 2026) https://apnews.com/article/haiti-us-deported-flight-tps-trump-e3b4e8aaffb70c3a962721fcce11b89b ("[Jean Négot Bonheur] Delva[, ONM director general,] noted that some of the deportees were not born in Haiti, although they are of Haitian descent. . . . 'There is one migrant who knows nothing about Haiti because he said he was coming from the Dominican Republic; that's where he was born.'"); Juhakenson Blaise, *Haitian officials face online backlash over TPS deportation response*, Haitian Times (Aug. 18, 2026), https://haitiantimes.com/2026/08/18/haitian-officials-mocked-over-tps-deportation-comments/; Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html (a Haiti-based political analyst says "[s]ome would be returning to a country whose language, culture and institutions are largely unfamiliar to them, while many older adults would face significant challenges finding employment and rebuilding their lives") (*internal quotations omitted*); *see*

also Frances Robles, *Deported From the U.S., Some Haitians Are Left Broke and Stranded*, New York Times (Sep. 6, 2026), https://www.nytimes.com/2026/09/06/world/americas/haiti-deportees.html (describing how "some [migrants] are now marooned in an unfamiliar place").

[413] Nathalye Cotrino, *"They Will Kill Me": Haitian Deportees from U.S. Face Fear, Uncertainty*, Just Security (Sep. 16, 2026), https://www.justsecurity.org/157194/haitian-deportees-face-fear-uncertainty/; Arelis R. Hernández, *ICE begins deporting Haitians who lost TPS back to homeland*, Washington Post (Aug. 20, 2026), https://www.washingtonpost.com/immigration/2026/08/20/ice-begins-deporting-haitians-who-lost-tps-back-homeland/ (Guerline Jozef, the co-founder of HBA, says "[d]eportees from the U.S. are especially vulnerable to kidnapping, extortion and murder once they land in Haiti," because "[c]riminals think they have been given money by the Trump administration to self-deport or have savings from their time stateside"); Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ (anthropologist Dr. Greg Beckett says "[a]nybody coming back from the diaspora or returning from TPS status is going to be seen. . . . as somebody who would vote against the gangs or would go against the gangs," with "people who have worked for the government or civil society organizations, or who have any kind of connections to a rival authority or power . . . particularly at risk of gang-related violence upon return;" RNDDH Executive Director Pierre Espérance adds when armed group members see "that you came back [to occupied territory], they will kidnap you. . . . they will target you, because they think you left because of them") (*internal quotations omitted*); Marty Schladen, *'Not a safe place.' Aid worker describes conditions in Haiti as Ohioans are forced to return*, News From The States (Aug. 11, 2026), https://www.newsfromthestates.com/article/not-safe-place-aid-worker-describes-conditions-haiti-ohioans-are-forced-return (the IRC's Deputy Director of Programs in Haiti says that "[b]ecause of their connection to the United States, people who are deported from Ohio are likely to be targets of kidnappings in the gangs' relentless quest for cash."); Jacqueline Charles, *U.S. lawmaker who visited Haiti says conditions would be 'a disaster' for TPS returnees*, Miami Herald (Aug. 1, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316728244.html; HRW, *US: Haitians Set to Lose Protections, Risk Return to Violence* (Jul. 2, 2026), https://www.hrw.org/news/2026/07/02/us-haitians-set-to-lose-protections-risk-return-to-violence ("Haitian TPS holders said that, if returned to Haiti, criminal groups would target them for kidnapping and extortion on the assumption that they have money after having lived in the United States. 'Losing TPS would be like a death sentence,' said a 28-year-old Haitian man. 'If they deport me to Haiti, people will think I have money because I lived abroad. They will try to extort or kidnap me. And because I have no money or savings to pay, they will kill me.'. . . Several Haitians with TPS told Human Rights Watch that, having lived in the United States, criminal groups would see them as 'white Haitians,' that is, people with money, making them immediate targets for kidnapping and extortion.").

[414] IOM, *Monthly monitoring of forced returns to Haiti – June 2026* (Jun. 30, 2026), https://dtm.iom.int/reports/haiti-monthly-monitoring-forced-returns-abroad-haiti-june-2026 ("[I]nterviews, conducted with a sample of over 43,000 forcibly returned persons between 2023 and 2025, showed that 53 percent of them had already experienced multiple forced returns.").

[415] HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives (according to Haitian government officials, "Haitian authorities lack the funding, staff, and policy frameworks to safely receive and assist deportees," and have "no plan in place to support deportees' longer-term reintegration"); Nathalye Cotrino, *"They Will Kill Me": Haitian Deportees from U.S. Face Fear, Uncertainty*, Just Security (Sep. 16, 2026), https://www.justsecurity.org/157194/haitian-deportees-face-fear-uncertainty/ ("[T]he deportees were largely left to fend for themselves, without any promise of follow-up or reintegration support."); GARR, *Un vol de déportation vers Haïti tourné au cauchemar : le GARR dénonce les conditions de déportations des ressortissants haïtiens* (Sep. 11, 2026), https://garrhaiti.org/2026/09/11/un-vol-de-deportation-vers-haiti-tourne-au-cauchemar-le-garr-denonce-les-conditions-de-deportations-des-ressortissants-haitiens/ ("The conditions are not currently in place in the country for a dignified reception of expelled persons. In addition to a highly concerning socio-economic context, the resources mobilized by the State to receive expelled Haitian nationals are clearly inadequate to meet immediate humanitarian needs, let alone guarantee their social and economic reintegration into the country."); Caitlin Stephen Hu & Etant Dupain, *In the city where Haitian deportees are being sent, locals say they're not ready*, CNN (Aug. 21, 2026), https://www.cnn.com/2026/08/21/americas/haiti-ice-deporatations-cap-intl-latam; Gerard Maxineau & Dánica Coto, *First group of deportees arrives in troubled Haiti after US ends TPS program*, Associated Press (Aug. 20, 2026) https://apnews.com/article/haiti-us-deported-flight-tps-trump-e3b4e8aaffb70c3a962721fcce11b89b (according to GARR, "there are no government measures in place to adequately assist these migrants"); Juhakenson Blaise, *Haitian officials face online backlash over TPS deportation response*, Haitian Times (Aug. 18, 2026), https://haitiantimes.com/2026/08/18/haitian-officials-mocked-over-tps-deportation-comments/ ("Haitians and advocates . . . say the government has offered assurances about reintegration without publicly presenting a concrete plan for housing, employment, health care, transportation or other assistance. . . . [A viral comedy sketch] highlights a contradiction at the center of the deportation debate: the Haitian government says it is preparing to reintegrate returnees while it remains unable to provide basic security and services to people already living there."); Tim Padgett, *Is it a human rights violation to deport Haitian TPS holders to a cauldron of gang violence?*, WLRN (Jul. 28, 2026), https://www.wlrn.org/immigration/2026-07-28/haiti-deportation-human-rights ("Given . . . [the insecurity crisis], it's little surprise Haiti's threadbare interim government has no plan in place for receiving or reintegrating hundreds of thousands of deportees from the U.S. to insulate them from the gang threat."); Juhakenson Blaise, *US to Haiti: Expect weekly TPS holder deportation flights*, Haitian Times (Jul. 21, 2026), https://haitiantimes.com/2026/07/21/us-informs-haiti-of-upcoming-deportations/ ("No public diplomatic initiative by Prime Minister Alix Didier Fils-Aimé's administration to seek a delay or suspension of the deportations has been announced, as some advocates have suggested. Nor have authorities outlined assistance programs for housing, employment or other reintegration initiatives."); *see also* Hamed Aleaziz, Zolan Kanno-Youngs & Frances Robles, *Trump Administration to Expand Deportation Flights to Haiti*, New York Times (Aug. 27, 2026), https://www.nytimes.com/2026/08/27/us/politics/haiti-deportation-flights.html (two deportation flights from the United States and the Bahamas in one day "outstripped the ability of the Haitian migration agency and the United Nations' International Organization for Migration to receive them," according to a senior researcher for HRW; the UN Independent Expert on Human Rights added that "[t]here is no way the Haitian government can handle [the massive influx of deportees]"); Jacqueline Charles & Syra Oriz Blanes, *As deportation flight lands in Haiti, U.S. says two planeloads a week will start soon*, Miami Herald (Jul. 16, 2026), https://www.miamiherald.com/news/nation-

world/world/americas/haiti/article316530874.html (the Haitian government has told U.S. officials that "[a]t this current rate . . . any sharp increase in the number of returnees would exceed their ability to provide humanitarian assistance or help with reintegration."); Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html (a Haiti-based political analyst says Haiti "lacks the security, infrastructure, and economic capacity to receive the[migrants]").

[416] HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives (describing the registration process and noting that the reception spaces do not offer "privacy for individualized assessments of health concerns, protection risks, or other vulnerabilities"); Nathalye Cotrino, *"They Will Kill Me": Haitian Deportees from U.S. Face Fear, Uncertainty*, Just Security (Sep. 16, 2026), https://www.justsecurity.org/157194/haitian-deportees-face-fear-uncertainty/ ("With the airport's small 'reception center' overwhelmed, officials hurriedly erected an outdoor canopy with one working toilet and no running water. Several people told me they did not know where they would sleep or what to do next.").

[417] According to information shared with the authors by Michelle Karshan, Executive Director of Alternative Chance/*Chans Altenativ*, so-called criminal deportees are forced to sleep on the floor in one cell, with women often sharing the space with 20 or more men. Because there is no access to a toilet, they are forced to use a "yard filled with broken vehicles" to relieve themselves. They are not given any food or water beyond the meal and water they were given directly after landing. (Notes on file with authors).

[418] *Compare* ONM, *Note de presse: rapatriement du 7e contingent des ressortissants Haïtiense n provenance des États-Unis* (Oct. 1, 2026), https://onm.gouv.ht/note-de-presse-rapatriement-du-7%E1%B5%89-contingent-des-ressortissants-haitiens-en-provenance-des-etats-unis/ (claiming to provide, *inter alia*, 25,000 gourdes (approximately US$192) per returnee, the provision of a substantial meal and drinks, medical and psychosocial support, transportation, hotel accommodation, and "guidance and support towards available public services and assistance mechanisms") *with* HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives (HRW observed that officials provided returnees with "a simple meal, a drink, and at least 10,000 Haitian gourdes (around US$77) in cash assistance," but that authorities "do not offer sustained shelter, health care, transportation, protection, or reintegration support," leaving returnees to fend for themselves; "officials from nine Haitian government institutions with responsibilities relevant to the deportees. . . . said Haitian authorities lack the capacity to provide shelter, continuing food assistance, safe onward transportation, sustained health or psychosocial care, or an established channel with US authorities to help deportees recover missing belongings"); *see also id.* ("Deportees said they relied on relatives or money wires for accommodation and onward travel. Some, particularly those from the Ouest and Artibonite departments, remained stranded for a couple of days because they could not safely return home or afford transportation, or because they feared crossing areas controlled by criminal groups."); Nathalye Cotrino, *"They Will Kill Me": Haitian Deportees from U.S. Face Fear, Uncertainty*, Just Security (Sep. 16, 2026), https://www.justsecurity.org/157194/haitian-deportees-face-fear-uncertainty/ ("Nothing I saw in Haiti indicates the country is able to receive deportees safely. Haitian officials are doing what they can, but a meal, a phone call, and a small cash payment cannot protect people from the widespread violence and deprivation that awaits them beyond Cap-Haïtien."); Frances Robles, *Deported From the U.S., Some Haitians Are Left Broke and Stranded*, New York Times (Sep. 6, 2026), https://www.nytimes.com/2026/09/06/world/americas/haiti-deportees.html (one returnee said Haitian officials gave him about US$80 when he landed, but after buying a change of clothes and a night at a "low-end hotel," he had "less than $40 left," and the journey to his hometown in Les Cayes (on the other side of the country) would cost him about US$220 plus "extra cash to pay off a potential gang 'toll'"); Caitlin Stephen Hu & Etant Dupain, *In the city where Haitian deportees are being sent, locals say they're not ready*, CNN (Aug. 21, 2026), https://www.cnn.com/2026/08/21/americas/haiti-ice-deporatations-cap-intl-latam; Edward Helmore, *First deportation flight lands in Haiti after TPS suspension*, The Guardian (Aug. 21, 2026), https://www.theguardian.com/us-news/2026/aug/21/haiti-deportation-tps (noting that transportation money provided by the Haitian government to returnees might get them through some armed group checkpoints but is less than the price of a ticket to Port-au-Prince).

[419] HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives ("Beyond limited assistance in urgent cases, Haitian authorities and humanitarian agencies do not offer sustained shelter, health care, transportation, protection, or reintegration support."); Hamed Aleaziz, Zolan Kanno-Youngs & Frances Robles, *Trump Administration to Expand Deportation Flights to Haiti*, New York Times (Aug. 27, 2026), https://www.nytimes.com/2026/08/27/us/politics/haiti-deportation-flights.html; Marty Schladen, *'Not a safe place.' Aid worker describes conditions in Haiti as Ohioans are forced to return*, News From The States (Aug. 11, 2026), https://www.newsfromthestates.com/article/not-safe-place-aid-worker-describes-conditions-haiti-ohioans-are-forced-return ("[B]ecause the U.N. and non-governmental organizations like the International Rescue Committee are stretched to the limit, returnees from the United States can't expect much help when they get to Haiti;" according to the International Rescue Committee's Deputy Director of Programs for Haiti, "[t]he humanitarian funding is very insufficient for what we're seeing in the country. . . . People who lost protected status in the United States have a specific vulnerability, but they're not being prioritized as if we were fully funded.") (*internal quotations omitted*); Jacqueline Charles & Syra Oriz Blanes, *As deportation flight lands in Haiti, U.S. says two planeloads a week will start soon*, Miami Herald (Jul. 16, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316530874.html ("The organization [GARR] is already struggling to assist an estimated 20,000 Haitians who are deported each month from the Dominican Republic, often in miserable conditions.").

[420] HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives ("Officials from Haiti's National Office for Migration said US authorities gave them about two days' notice of the August 20 and 27 flights. In both cases, however, the passenger lists from the United States did not accurately reflect the number of people who arrived. . . . The manifests did not contain the grounds for removal or information about deportees' immigration status, needs, family contacts, or belongings. 'We have no way of knowing in advance whether someone will arrive with an urgent medical condition, a disability, a protection concern, or another vulnerability,' a Haitian migration official said. 'Without that information, it is even harder for us to prepare to receive deportees and coordinate with other institutions to provide even minimal assistance.'"); Jacqueline Charles & Gérard Maxineau, *Deportation flight delays, ICE's last-minute adds leave Haitian officials scrambling*, Miami Herald (Sep. 11, 2026), https://www.miamiherald.com/news/nation-

world/world/americas/haiti/article317199306.html (ONM director Jean Négot Bonheur Delva says that U.S. government failures to communicate with ONM are "a huge problem" and come with a significant cost, which ends up being borne by returnees; for example, ONM officials planned to increase the amount of monetary support provided to returnees to US$200 per returnee, but an unanticipated increase in returnees on a September 10 flight mean that "officials no longer had enough money to provide the increased assistance or to cover lodging"); GARR, *Un vol de déportation vers Haïti tourné au cauchemar : le GARR dénonce les conditions de déportations des ressortissants haïtiens* (Sep. 11, 2026), https://garrhaiti.org/2026/09/11/un-vol-de-deportation-vers-haiti-tourne-au-cauchemar-le-garr-denonce-les-conditions-de-deportations-des-ressortissants-haitiens/.

[421] U.S. Department of State, *Haiti*, https://travel.state.gov/en/international-travel/travel-advisories/haiti.html (last visited Oct. 20, 2026) ("U.S. commercial flights are not currently operating to or from Port-au-Prince. The Federal Aviation Administration (FAA) issued a Notice to Airmen (NOTAM) that prohibits U.S. air carrier flights to Port-au-Prince due to ongoing instability."); Edward Helmore, *First deportation flight lands in Haiti after TPS suspension*, The Guardian (Aug. 21, 2026), https://www.theguardian.com/us-news/2026/aug/21/haiti-deportation-tps ("The arrival point was selected because the main international airport in the capital, Port-au-Prince, is considered too dangerous. The US government currently has a ban on US commercial flights to Haiti's capital through early September because of ongoing gang violence."); Gerard Maxineau & Dánica Coto, *First group of deportees arrives in troubled Haiti after US ends TPS program*, Associated Press (Aug. 20, 2026) https://apnews.com/article/haiti-us-deported-flight-tps-trump-e3b4e8aaffb70c3a962721fcce11b89b.

[422] HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives; Nathalye Cotrino, *"They Will Kill Me": Haitian Deportees from U.S. Face Fear, Uncertainty*, Just Security (Sep. 16, 2026), https://www.justsecurity.org/157194/haitian-deportees-face-fear-uncertainty/ (one returnee said the money provided by the Haitian government "is not enough" for him to reach his relatives in southern Haiti, including because "[t]here are checkpoints, and if you cannot pay, you can be kidnapped or killed.") (*internal quotations omitted*); Frances Robles, *Deported From the U.S., Some Haitians Are Left Broke and Stranded*, New York Times (Sep. 6, 2026), https://www.nytimes.com/2026/09/06/world/americas/haiti-deportees.html ("The road out of Cap Haitien, on Haiti's northern coast, is controlled by gangs that extract tolls from drivers and kidnap travelers. Five police officers who tried the trip by bus recently were murdered."); Hamed Aleaziz, Zolan Kanno-Youngs & Frances Robles, *Trump Administration to Expand Deportation Flights to Haiti*, New York Times (Aug. 27, 2026), https://www.nytimes.com/2026/08/27/us/politics/haiti-deportation-flights.html ("The journey from Cap Haitien to Port-au-Prince used to be a six-hour drive, but it is now considered extremely unsafe. Gangs control the main highway connecting the two cities, extracting tolls and sometimes kidnapping the passengers."); Gerard Maxineau & Dánica Coto, *First group of deportees arrives in troubled Haiti after US ends TPS program*, Associated Press (Aug. 20, 2026) https://apnews.com/article/haiti-us-deported-flight-tps-trump-e3b4e8aaffb70c3a962721fcce11b89b (according to the director general of the ONM, "several deportees planned to travel to Haiti's southern region, a dangerous journey because gangs control the main routes leading to that area and are known to randomly open fire on vehicles passing through"); AlterPresse, *Haïti-Criminalité : La Route nationale numéro 1 ou la vallée de l'ombre de la mort ?* (Aug. 12, 2026), https://www.alterpresse.org/Haiti-Criminalite-La-Route-nationale-numero-1-ou-la-vallee-de-l-ombre-de-la-mort (describing the deadly risk associated with traveling between Gonaïves and Port-au-Prince, the second half of the route returnees would need to take in order to reach the capital from Cap-Haïtien); Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("[N]avigating the gang checkpoints to get from where the plane lands to their home could prove deadly. Human rights advocates report that people who cannot justify their presence in a particular area are increasingly often assaulted, and even killed, while attempting to cross a gang checkpoint."); Maye Primera, *'Nobody should be forced to return to Haiti': UN expert warns the island is unfit to receive deportees*, El País (Aug. 9, 2026), https://english.elpais.com/usa/2026-08-09/nobody-should-be-forced-to-return-to-haiti-un-expert-warns-the-island-is-unfit-to-receive-deportees.html (the UN's independent expert on human rights in Haiti says for returnees who come from areas under the control of armed groups "have no way to return safely").

[423] Edward Helmore, *First deportation flight lands in Haiti after TPS suspension*, The Guardian (Aug. 21, 2026), https://www.theguardian.com/us-news/2026/aug/21/haiti-deportation-tps; Gerard Maxineau & Dánica Coto, *First group of deportees arrives in troubled Haiti after US ends TPS program*, Associated Press (Aug. 20, 2026) https://apnews.com/article/haiti-us-deported-flight-tps-trump-e3b4e8aaffb70c3a962721fcce11b89b.

[424] *See* IJDH, *Human Rights Update – March 2026*, note 119 (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf.

[425] Jacqueline Charles & Gérard Maxineau, *Deportation flight delays, ICE's last-minute adds leave Haitian officials scrambling*, Miami Herald (Sep. 11, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317199306.html ("Global X Flight 6122 flight left Alexandria, Louisiana, for South Florida at 7:34 a.m. and was initially supposed to arrive in Cap-Haïtien at 12:22 p.m. But after hours of unexplained delays, the flight did not leave Opa-locka Executive Airport until 5:10 p.m. It landed in Haiti after sunset at 7:05 p.m. amid heavy rain, long after Haitian government offices had closed for the day and after the deportees had spent more than 13 hours in shackles, not including the flying time. 'It's a huge problem for us because we in Haiti work from 8 a.m. to 4 p.m.,' Jean Négot Bonheur Delva, the director general of the Office of National Migration, told the Miami Herald. 'The latest time for us to receive an aircraft is 1 p.m. or 2 p.m. because it will take two to three hours of us to provide assistance to these immigrants.'. . . 'By the time they leave the airport in Haiti, people, including families and children, will have to find their bearings and navigate their way to some semblance of safety in the darkness amidst extreme instability and insecurity,' said Savi Arvey, director of policy, refugee and immigrant rights at Human Rights First.").

[426] GARR, *Un vol de déportation vers Haïti tourné au cauchemar : le GARR dénonce les conditions de déportations des ressortissants haïtiens* (Sep. 11, 2026), https://garrhaiti.org/2026/09/11/un-vol-de-deportation-vers-haiti-tourne-au-cauchemar-le-garr-denonce-les-conditions-de-deportations-des-ressortissants-haitiens/ ("This situation also applies to deportations taking place at the Haitian-Dominican border. Migrants, including unaccompanied children, pregnant women, and other vulnerable groups, are deported there after 4:00 PM, without any reception facilities, in flagrant violation of the 1999 Memorandum of Understanding."); OCHA, *Haiti Humanitarian Bulletin March - May 2026*, p. 5 (Jul. 13, 2026), https://reliefweb.int/report/haiti/ocha-haiti-humanitarian-bulletin-march-may-2026 (in the border town of Ouanaminthe, "peaks

of 500 to 600 arrivals per day have been observed," which is "placing significant strain on reception and assistance mechanisms"). For statistics on returns from the Dominican Republic from January to June 2026, *see* IOM, *Monthly monitoring of forced returns to Haiti – June 2026* (Jun. 30, 2026), https://dtm.iom.int/reports/haiti-monthly-monitoring-forced-returns-abroad-haiti-june-2026.

[427] HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives; Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ (many returnees initially fled Haiti after being displaced when armed groups occupied their neighborhoods; now, those same neighborhoods remain occupied, leaving returnees with nowhere to go); Maye Primera, *'Nobody should be forced to return to Haiti': UN expert warns the island is unfit to receive deportees*, El País (Aug. 9, 2026), https://english.elpais.com/usa/2026-08-09/nobody-should-be-forced-to-return-to-haiti-un-expert-warns-the-island-is-unfit-to-receive-deportees.html (the UN's independent expert on human rights in Haiti says returnees who come from areas under the control of armed groups "go back to a neighborhood that has been burned and where everything is destroyed," where "[t]here are no jobs, no opportunities, very little schooling, no medical care"); HRW, *US: Haitians Set to Lose Protections, Risk Return to Violence* (Jul. 2, 2026), https://www.hrw.org/news/2026/07/02/us-haitians-set-to-lose-protections-risk-return-to-violence ("Even those who said they might try to avoid areas controlled by criminal groups if they returned said life would be impossible given the country's near-total collapse. 'I can't go back,' said a 33-year-old woman who now works as a patient care assistant at a Miami hospital. 'At best, I would have to move to a city outside the capital, but even there I don't know how I would survive. There is no work, no food, nothing. My options would be to die of hunger or violence.'"); Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html.

[428] Tim Padgett, *Is it a human rights violation to deport Haitian TPS holders to a cauldron of gang violence?*, WLRN (Jul. 28, 2026), https://www.wlrn.org/immigration/2026-07-28/haiti-deportation-human-rights (Haitian civic leader Louis-Henri Mars says adding another 350,000 TPS holders to "a country that already has 1.5 million refugees in the streets and in makeshift camps. . . . [is] a nightmare," and that "[m]any would be compelled to rejoin families living in dangerous areas, if not in the squalid displacement camps") (*internal quotations omitted*); Maye Primera, *'Nobody should be forced to return to Haiti': UN expert warns the island is unfit to receive deportees*, El País (Aug. 9, 2026), https://english.elpais.com/usa/2026-08-09/nobody-should-be-forced-to-return-to-haiti-un-expert-warns-the-island-is-unfit-to-receive-deportees.html ("The displacement camps do not offer safety either: they are makeshift shelters set up in public parks and vacant lots, tents and cardboard-and-wood shacks where hundreds of people live without food, water or basic services. Haitians barely have enough to live on or to eat. How can they be expected to take on more mouths to feed in places that are already so overcrowded?") (*internal quotations omitted*); *see also* Frances Robles, *Deported From the U.S., Some Haitians Are Left Broke and Stranded*, New York Times (Sep. 6, 2026), https://www.nytimes.com/2026/09/06/world/americas/haiti-deportees.html ("Haitian officials acknowledge . . . that some deportees are likely to become homeless in northern Haiti."); notes 75-86 and associated text.

[429] HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives.

[430] HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives (describing the pressure on "already inadequate electricity, water, housing, health care, and municipal services"); Caitlin Stephen Hu & Etant Dupain, *In the city where Haitian deportees are being sent, locals say they're not ready*, CNN (Aug. 21, 2026), https://www.cnn.com/2026/08/21/americas/haiti-ice-deporatations-cap-intl-latam ("Locals say the city is already inundated. 'Cap-Haitian alone can't receive more people,' said Demonstène Reynold, a mechanic living in Cap. 'We're not just receiving deportees from outside of Haiti … due to the political crisis, we have people from Hinche and Port-au-Prince, from the interior of the country.'. . . Louis Ronald Espoir, an administrator at the city's Hospital Fort Saint Michel, said the city's medical facilities are at capacity. 'As you can see here with your own eyes, all the hospitals in the region are full despite the best efforts of the government. If they're full with the current population, I'd be lying to say we can take in anyone else.'"); Jacqueline Charles, *U.S. lawmaker who visited Haiti says conditions would be 'a disaster' for TPS returnees*, Miami Herald (Aug. 1, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316728244.html (in response to a U.S. State Department official implying that Cap-Haïtien could absorb the influx of returnees, Haitian Prime Minister Fils-Aimé said the city was not built for this number of people and cannot take on additional returnees); *see also* Hamed Aleaziz, Zolan Kanno-Youngs & Frances Robles, *Trump Administration to Expand Deportation Flights to Haiti*, New York Times (Aug. 27, 2026), https://www.nytimes.com/2026/08/27/us/politics/haiti-deportation-flights.html (reporting that returnees who are unable to make the dangerous journey to their home communities "may choose to stay there [in Cap-Haïtien], as the northern part of the country is safer"); Gérard Maxineau, *With 22,000 Monthly Passengers, Cap-Haïtien Airport Moves to a New Level*, Le Nouvelliste (Aug. 26, 2026), https://lenouvelliste.com/en/article/271172/with-22000-monthly-passengers-cap-haitien-airport-moves-to-a-new-level (reporting that the Cap-Haïtien airport is struggling to accommodate the increase in passengers "while using infrastructure originally designed for a much lower level of activity"); Claudy Junior Pierre, *The North's Health Sector Needs Attention Before a Crisis Erupts*, Le Nouvelliste (May 13, 2026) https://lenouvelliste.com/en/article/267260/the-norths-health-sector-needs-attention-before-a-crisis-erupts.

[431] HRW, *US: Deportations to Haiti Endanger Lives* (Sep. 21, 2026), https://www.hrw.org/news/2026/09/21/us-deportations-to-haiti-endanger-lives.

[432] UNICEF, *Haiti Humanitarian Situation Report No. 2*, p. 2 (Aug. 11, 2026), https://www.unicef.org/media/183661/file/Haiti-Humanitarian-Situation-Report-No.%202(Mid-Year),30-June-2026.pdf.pdf; Marty Schladen, *'Not a safe place.' Aid worker describes conditions in Haiti as Ohioans are forced to return*, News From The States (Aug. 11, 2026), https://www.newsfromthestates.com/article/not-safe-place-aid-worker-describes-conditions-haiti-ohioans-are-forced-return ("[H]undreds of thousands of returnees will only add to the humanitarian crisis in a country whose legitimate economy is on life support, . . . aid workers said."); Tim Padgett, *Is it a human rights violation to deport Haitian TPS holders to a cauldron of gang violence?*, WLRN (Jul. 28, 2026), https://www.wlrn.org/immigration/2026-07-28/haiti-deportation-human-rights (HRW's director of refugee and migrant rights says that "[m]ass deportations would put these people in grave danger and exacerbate

Haiti's humanitarian crisis") (*internal quotations omitted*); Russel L. Honoré, *Haiti Is a War Zone. Why Are We Banishing Our Neighbors There?*, New York Times (Jul. 23, 2026), https://www.nytimes.com/2026/07/23/opinion/trump-haiti-tps-immigration.html?smid=nytcore-ios-share (Lt. Gen. Honoré, the former commanding general of the U.S. First Army, says "[f]orcing hundreds of thousands of people into the shadows or onto deportation flights to a volatile nation still consumed by violence and political instability would only feed the chaos" and "risk worsening Haiti's humanitarian crisis, severing the remittances that sustain families in Haiti and expanding the recruitment pool for the gangs the international community is trying to defeat"); Jacqueline Charles, *Supreme Court TPS ruling could deepen Haiti's worsening crisis, experts say*, Miami Herald (Jun. 25, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316271816.html (the UN's independent expert on human rights in Haiti and says the decision to terminate TPS "will only exacerbate a humanitarian and human rights catastrophe in Haiti;" a Haiti-based political analyst adds that "[r]eturning hundreds of thousands of people under these conditions risk deepening an already severe humanitarian crisis at a time when Haiti is struggling to restore security, rebuild its economy and re-establish the rule of law") (*internal quotations omitted*).

[433] *See* Romain Le Cour Grandmaison, *Why a security approach alone isn't enough to rid Haiti of gangs*, The New Humanitarian (Apr. 29, 2026), https://www.thenewhumanitarian.org/opinion/2026/04/29/why-security-approach-alone-isnt-enough-rid-haiti-gangs; *see also* Section I.

[434] *See* Section I.

[435] *See* Section VII.

[436] Russel L. Honoré, *Haiti Is a War Zone. Why Are We Banishing Our Neighbors There?*, New York Times (Jul. 23, 2026), https://www.nytimes.com/2026/07/23/opinion/trump-haiti-tps-immigration.html?smid=nytcore-ios-share ("In light of the failures of the Kenyan-led mission, the U.N. Security Council has authorized the deployment of a new, international Gang Suppression Force — an offensive, intelligence-driven mission that will more explicitly aim to take the fight to the gangs."); Jacqueline Charles, *U.N. Security Council renews gang-fighting force for Haiti amid fresh attacks*, Miami Herald (Sep. 29, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317423130.html ("The Gang Suppression Force was authorized a year ago for 5,500 personnel and was pitched as a much more robust force than its predecessor, the police-led Multinational Security Support mission headed by Kenya. The Kenya-led force never achieved the 2,500 personnel it was supposed to have before departing Haiti in April. . . . The gang-fighting force was intentionally constructed to be different from the Kenyan-led mission or a traditional peacekeeping force. For example, responsibility for generating forces rests with a Standing Group of Partners, led primarily by the U.S. and including Jamaica, The Bahamas, Canada, Guatemala and El Salvador. A 'Tiger team' is responsible for determining the personnel and equipment needed, and ultimately deciding who will deploy and with what equipment."); Juhakenson Blaise, *Dominican Republic rules out troop deployment to Haiti's gang force*, Haitian Times (Jul. 15, 2026), https://haitiantimes.com/2026/07/15/dominican-republic-humanitarian-not-operational-haiti-force/ ("Unlike the MSS mission, which struggled with funding shortages and never reached its planned strength of 2,500 personnel, the GSF has broader operational authority and receives logistical support through a U.N. office responsible for facilitating equipment, weapons and ammunition."); Sophie Rutenbar, *Another gang suppression force may win battles, yet lose Haiti's deeper war*, Miami Herald (Apr. 6, 2026), https://www.miamiherald.com/opinion/op-ed/article315290165.html ("Around Washington, there's a sense of inevitability. The lessons from the MSS have been learned: the GSF will have a military mandate, operational independence and the support infrastructure, funding, and personnel to take on the gangs."); *see also* IJDH, *Human Rights Update – July 2025*, p. 13 (Jul. 2025), https://www.ijdh.org/wp-content/uploads/HRU-July-2025.pdf.

[437] Alterpresse, *Haïti-Artibonite-Violences : Plus d'une centaine de victimes en un mois et demi, l'action de la Frg toujours attendue* (Sep. 18, 2026), https://www.alterpresse.org/Haiti-Artibonite-Violence-Plus-d-une-centaine-de-victimes-en-un-mois-et-demi-l-action-de-la-FRG-toujours-attendue ("The security situation continues to deteriorate in the Artibonite department (North), where more than one hundred people were directly victims of gang violence between Saturday, August 1, and Tuesday, September 15, 2026, despite the deployment of the Gang Repression Force (FRG), with an operational base in Gonaïves, the main city of the department. . . . On Thursday, August 6, 2026, a contingent of Sri Lankan soldiers, accompanied by armored vehicles, tactical equipment and heavy machinery, landed in the port of Gonaïves. More than a month later, local organizations are, however, deploring the lack of operations against gangs in Lower Artibonite."); CPJ, *Veteran Haitian journalist Wesly Renaud Jean abducted, ransom requested* (Sep. 12, 2026), https://cpj.org/2026/09/veteran-haitian-journalist-wesly-renaud-jean-abducted-ransom-requested/ (noting "mounting concerns that security is not improving in the country despite the arrival of a UN-backed Gang Suppression Force"); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 29, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("While the participation of the Multinational Security Support Mission [and the GSF] in Haitian National Police operations and its presence in the lower Artibonite had some deterrent effects on gang activity, the general security situation continued to deteriorate, notwithstanding their presence in the country.").

[438] *See* Berk Kutay Gokmen, *US condemns 'savage' gang attacks in Haiti, urges swift deployment of suppression force*, AA (Aug. 28, 2026), https://www.aa.com.tr/en/americas/us-condemns-savage-gang-attacks-in-haiti-urges-swift-deployment-of-suppression-force/4040640; María Fernanda Arocha, *Haiti's Kenscoff remains the target of deadly attacks. Why does this continue to happen?*, ACLED (Aug. 25, 2026), https://acleddata.com/expert-comment/haitis-kenscoff-remains-target-deadly-attacks-why-does-continue-happen.

[439] According to GSF officials, the force has been engaged in limited operations, mostly patrols, since June 2026 – nearly a year after its initial authorization. UNSC, *Letter dated 2 July 2026 from the Secretary-General addressed to the President of the Security Council*, UN Doc.S/2026/554 (Jul. 6, 2026) (GSF Special Representative Jack Christofides confirmed that the GSF commenced operations on June 1, 2026, and presented a detailed roadmap of proposed objectives and timelines); *see also* Le Nouvelliste, *The FRG Begins Joint Patrols with the PNH in Downtown Port-au-Prince* (Sep. 1, 2026), https://lenouvelliste.com/en/article/271500/the-frg-begins-joint-patrols-with-the-pnh-in-downtown-port-au-prince (the GSF announced "a new phase of its deployment . . . underway in Port-au-Prince," consisting of patrols in armored vehicles on several streets in downtown Port-au-Prince); BINUH, *Quarterly Report on the human rights situation in Haiti (April – June 2026)*, p. 15

(Aug. 25, 2026), https://binuh.unmissions.org/en/document-library/quarterly-report-on-the-human-rights-situation-in-haiti-april-june-2026 ("The Gang Suppression Force (GSF), which has not yet been fully deployed, mainly conducted regular patrols in certain areas of the Port-au-Prince metropolitan area. On 21 June, during one of its operations in the Tabarre 43 area, it apprehended 14 individuals suspected of association with gangs. Thirteen of them were subsequently released by the judicial authorities due to insufficient evidence linking them to criminal activities. One individual, however, remained in detention pending further judicial proceedings."); Jacqueline Charles, *U.N. reports sharp rise in rapes in Haiti as country braces for end of TPS*, Miami Herald (Jul. 30, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316706875.html (according to the GSF Special Representative, the force "has established its headquarters and rules of engagement, as well as some of the first command-and-control arrangements and intelligence structures, . . . deployed its first forward operating base inside a strategic area for expansion, established continuous patrol patterns and begun operations against gang infrastructure," and "finalized key legal agreements governing its deployment"); Jacqueline Charles, *U.N. Security Council renews gang-fighting force for Haiti amid fresh attacks*, Miami Herald (Sep. 29, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317423130.html (Russia's UNSC representative noted that "[i]mplementation of this initiative has encountered virtually the full range of problems that were known in advance: difficulties in finding and preparing the necessary contingents, ensuring sustainable financing and the unclear legal status of the newly created mission," which has delayed deployment) (*internal quotations omitted*); Jacqueline Charles, *U.S. lawmaker who visited Haiti says conditions would be 'a disaster' for TPS returnees*, Miami Herald (Aug. 1, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316728244.html (in August, U.S. Representative Ami Bera said the force was "still kind of ramping things up and getting up to full speed"); Tim Padgett, *Is it a human rights violation to deport Haitian TPS holders to a cauldron of gang violence?*, WLRN (Jul. 28, 2026), https://www.wlrn.org/immigration/2026-07-28/haiti-deportation-human-rights (senior adviser to the nonprofit Institute for Research and Action for Peace in Port-au-Prince Louis Henri Mars said the force has "not really started operations," despite there being about a thousand officers on the ground in Haiti); Jacqueline Charles, *Haiti electoral council sets calendar for first elections in a decade. Is it realistic?*, Miami Herald (Jul. 24, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316646068.html (noting the expiration of the GSF's one-year mandate on September 30 and that, "[e]ven if extended, the mission will need time to acclimate after what its leadership described on Monday to the United Nations Security Council as 'deliberately incremental' operations"); Russel L. Honoré, *Haiti Is a War Zone. Why Are We Banishing Our Neighbors There?*, New York Times (Jul. 23, 2026), https://www.nytimes.com/2026/07/23/opinion/trump-haiti-tps-immigration.html?smid=nytcore-ios-share ("[I]f the new force is not adequately equipped or integrated into a broader Haitian-led strategy, it risks repeating the same mistakes as the last intervention. And merely replacing one temporary foreign force with another will not save Haiti. What Haiti really needs are the institutions of a sovereign nation: a professional police force, a capable national army and the resources to secure its territory. Lasting stability cannot be imported. It must be built and sustained by Haitians.").

[440] GSF officials stated in November 2025 that they were confident the majority of the proposed 5,500 personnel would be deployed by summer 2026; that timeline has been been repeatedly pushed back. Jaqueline Charles, *Troops for Gang Suppression Force in Haiti expected in April; U.N. says work is on track*, Miami Herald (Jan. 29, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article314499097.html; Edith M. Lederer, *UN expert: Haiti has a chance now to tackle gang violence as new international force deploys*, Associated Press (Mar. 16, 2026), https://apnews.com/article/un-haiti-gang-suppression-force-us-1e370b6e0fd40ac9dad33751e08c6cea (the entire force was expected to be on the ground by September, according to the UN's independent expert on human rights in Haiti); Le Nouvelliste, *FRG: The 5,500 Members Target Will Not Be Reached in October, According to Igor Rugwiza* (Sep. 1, 2026), https://lenouvelliste.com/en/article/271468/frg-the-5500-members-target-will-not-be-reached-in-october-according-to-igor-rugwiza (the GSF spokesperson said the force "will not reach the 5,500 members . . . during the month of October as previously planned"); *see also* Juhakenson Blaise, *UN extends Haiti's Gang Suppression Force mandate to March 2027 amid rising violence*, Haitian Times (Sep. 29, 2026), https://haitiantimes.com/2026/09/29/haiti-anti-gang-force-mandate-extended-march-2027/ ("According to a Security Council Report, the force's military component had 1,083 personnel as of July 8, along with 16 civilian staff members. . . . But according to the United States, more than 1,500 troops are already deployed in Haiti, with over 4,000 being expected in the coming months. The force's troops and police currently come from Chad, El Salvador, Guatemala, Jamaica, Mongolia and Sri Lanka."); Jacqueline Charles, *Chadian troops arrive in Haiti as cops say they arrest Floridian who had AR-15*, Miami Herald (Sep. 19, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317307251.html (reporting the deployment of an additional 300 troops, but noting the continued lack of "manpower and equipment to conduct major operations" due to "delays by troop-contributing countries and difficulties getting equipment into Haiti"); Washington Post, *A U.N. force was supposed to secure Haiti. A year later, gangs rule* (Aug. 28, 2026), https://www.washingtonpost.com/opinions/2026/08/28/haitians-are-being-deported-into-violent-abyss-after-losing-tps/ ("These [GSF] peacekeepers were supposed to replace the hapless Kenyan-led police force, which struggled from the start with inadequate personnel and weapons and with navigating rules of engagement that required them to mostly provide backup to outgunned local police. The U.N.-backed entity came with a more forceful mandate to take the fight to the gangs and disarm them. But the force has been underfunded and numbered only about 1,000 as of last month."); UN, *Kenscoff Massacre Exposes Worsening Brutality of Haiti's Gang Criss, Security Council Hears, as Speakers Urge Rapid International Support* (Aug. 28, 2026), https://press.un.org/en/2026/sc16444.doc.htm (noting that Chad, Mongolia and Côte d'Ivoire have signed agreements with Haiti to join the GSF, with similar discussions reportedly under way with Jamaica, Sri Lanka, and Bangladesh); Jacqueline Charles, *Parts of Haiti have been turned into kill zones for gangs, top U.S. diplomat tells U.N.*, Miami Herald (Jul. 20, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316578654.html (in addition to personnel shortages, "[t]he limited availability of strategic air transport to quickly move the pre-committed troops and equipment, has hampered deployment") (*internal quotations omitted*); Juhakenson Blaise, *Dominican Republic rules out troop deployment to Haiti's gang force*, Haitian Times (Jul. 15, 2026), https://haitiantimes.com/2026/07/15/dominican-republic-humanitarian-not-operational-haiti-force/; UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 6, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("Six months after the transition of the Multinational Security Support Mission into the Gang Suppression Force (see Security Council resolution 2793 (2025)), the force composition has remained unchanged. The full deployment of the Gang Suppression Force remains essential to restore security and support political stabilization and the implementation of the electoral process.").

[441] Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees.

[442] UNSC, *Letter dated 2 July 2026 from the Secretary-General addressed to the President of the Security Council*, UN Doc.S/2026/554 (Jul. 6, 2026) (GSF Special Representative Jack Christofides said the force will need until September 30, 2028 to fulfil its mandate, which he stresses does not correspond to a complete stabilization of Haiti, rather "the establishment of minimum security conditions necessary for sustained international stabilization efforts and the gradual rebuilding of Haitian security institutions with international support"); UNSC, *Resolution 2829 (2026)*, UN Doc. S/RES/2829 (Sep. 29, 2026), https://digitallibrary.un.org/record/4129393?v=pdf; *see also* Sarah Morland, *Haiti urges UN to renew anti-gang force mandate ahead of planned election*, Reuters (Sep. 3, 2026), https://www.reuters.com/world/americas/haiti-urges-un-renew-anti-gang-force-mandate-ahead-planned-election-2026-09-03/ (Justin Gorkowski, who co-leads a U.S. GSF oversight team, noted the force's "limited resources" and said it is just 20% staffed); Francklyn B. Geffrard, *FRG prolongée : 73 jours pour transformer un mandat international en sécurité et en élections…*, Rhinews (Oct. 1, 2026), https://www.rhinews.com/opinion/frg-prolongee-73-jours-pour-transformer-un-mandat-international-en-securite-et-en-elections/ (cautioning that a renewed mandate does not equate to sufficient resources or operational capacity); Jovani Davis, *Antigua and Barbuda urge OAS members to back renewal of Haiti security force*, CNW (Sep. 24, 2026), https://www.caribbeannationalweekly.com/posts/three-caribbean-countries-join-us-led-action-against-haiti-gangs ("Antigua and Barbuda's Ambassador Sir Ronald Sanders. . . . cautioned that renewing the mandate would achieve little unless governments honor their commitments to provide personnel, financing, equipment and logistical support. A force authorised on paper but deprived of the resources necessary to fulfil its mandate cannot deliver the security that the Haitian people desperately need.") (*internal quotations omitted*); Jacqueline Charles, *U.N. Security Council renews gang-fighting force for Haiti amid fresh attacks*, Miami Herald (Sep. 29, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317423130.html (reporting opposition to the reauthorization from China's and Russia's representatives, who raised concerns about financing and staffing issues, alongside the broader question of "whether resorting to external military force to suppress or even neutralize gangs is the right way to solve the security plight") (*internal quotations omitted*); Sarah Morland, *UN renews Haiti force mandate for six months after fresh gang killings*, Reuters (Sep. 29, 2026), *available at* https://www.internazionale.it/ultime-notizie-reuters/2026/09/29/un-renews-haiti-force-mandate-for-six-months-after-fresh-gang-killings.

[443] *See* IJDH, *Human Rights Update – March 2026*, p. 12 (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf; IJDH, *Human Rights Update – July 2025*, p. 13 (Jul. 2025), https://www.ijdh.org/wp-content/uploads/HRU-July-2025.pdf; Yasmin Sooka & Frances Harrison, *The Punishment for Peacekeepers Raping Haitian Children Was Dismissal*, PassBlue (Sep. 16, 2026), https://passblue.com/2026/09/16/the-punishment-for-peacekeepers-raping-haitian-children-was-dismissal/ (discussing gross mishandling of systemic sexual exploitation and abuse of Haitian children by UN peacekeepers from 2004 to 2007); CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, p. 31-333 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 ("The MINUSTAH and Oxfam cases established a pattern: exploitation followed by institutional impunity.").

[444] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 78-81, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (documenting that OHCHR and the Panel of Experts corroborated four cases of rape by MSS personnel, that local civil society identified additional cases of SEA, and that Kenyan authorities and an MSS board of inquiry determined the allegations to be unsupported); *see also* UNGA, *Special measures for protection from sexual exploitation and abuse Report of the Secretary-General*, UN Doc. A/80/644, ¶¶ 72-74 (Feb. 16, 2026), https://docs.un.org/en/A/80/644; UN Secretary General, *Supplementary information to the report of the Secretary-General on special measures for protection from sexual exploitation and abuse (A/80/644)*, p. 43 (2026), https://www.un.org/preventing-sexual-exploitation-and-abuse/sites/www.un.org.preventing-sexual-exploitation-and-abuse/files/smr_2026_a-80-644_supplementary_data.pdf; *see also* Coalition of Haitian and Solidarity Feminist, Women's Rights, and Human Rights Organizations, *Joint Submission to the United Nations Human Rights Council Universal Periodic Review Re Women's Rights in Haiti*, ¶ 30 (Jul. 17, 2026), https://www.ijdh.org/wp-content/uploads/2026.07.17-UPR-Submission-re-Womens-Rights-by-AdvanceWomensRightsHaiti-Coalition-EN-w-CoverPage.pdf. Although the OHCHR report is dated February 2026, the allegations did not become publicly known until revealed by Ayibopost in April 2026. A a previous report of SEA involving a member of the MSS and a young girl was denied as "propaganda" by an MSS spokesperson, even though a member of the MSS steering committee responsible for overseeing human rights compliance said that the allegation was "confirmed" based on information he had. Jérôme Wendy Norestyl & Wethzer Piercin, *The Kenyan mission implicated in 4 cases of sexual abuse and exploitation in Haïti*, Ayibo Post (Apr. 2, 2026), https://ayibopost.com/the-kenyan-mission-implicated-in-4-cases-of-sexual-abuse-and-exploitation/; *see also* Jérôme Wendy Norestyl, *Clash between the Kenyans and the United Nations over sexual abuse cases in Haiti*, AyiboPost (Apr. 26, 2026), https://backoffice.ayibopost.com/clash-between-the-kenyans-and-the-united-nations-over-sexual-abuse-cases-in-haiti/ (reporting MSS claim that the UN had notified the mission of the four allegations in November 2025).

The handling of this latest abuse of power in connection with international troop deployment violates established "zero tolerance" policies and explicit promises made by the UN when authorizing yet another foreign force into Haiti over objections of Haitian civil society. GSF, *About the Mission*, https://gangsuppressionforce.org/ (last visited Oct. 20, 2026); UNSC, Resolution 2793 (2025), S/RES/2793, ¶¶ 18, 20 (Sep. 30, 2025), https://docs.un.org/S/RES/2793(2025). The initial OHCHR investigation included interviews with persons who had direct knowledge of the circumstances, and led the team to deem the allegations of SEA against girls aged 12, 16, 16, and 18 to be substantiated. As the UN Panel of Experts reports, the Kenyan authorities worked with the MSS to set up a board of inquiry, which deemed the allegations not supported by evidence based on later investigation. According to a source, that investigation did not conduct a meaningful inquiry, including because all investigators lacked competence in Haitian Creole or French. *Cf.* Jérôme Wendy Norestyl, *Clash between the Kenyans and the United Nations over sexual abuse cases in Haiti*, AyiboPost (Apr. 26, 2026), https://backoffice.ayibopost.com/clash-between-the-kenyans-and-the-united-nations-over-sexual-abuse-cases-in-haiti/ (reporting on OHCHR communication affirming the methodological soundness of its investigation substantiating the allegations and emphasizing that lack of official complaints does not affect reliability). The MSS investigation's

conclusion is therefore at best misleading. At worst, it is another UN-authorized deployment coverup of grave abuses against a vulnerable population in Haiti. *Cf.* Michael Brice-Saddler, *U.N. peacekeepers fathered, then abandoned, hundreds of children in Haiti, reports says*, Washington Post (Dec. 18, 2019), https://www.washingtonpost.com/world/2019/12/18/un-peacekeepers-fathered-then-abandoned-hundreds-children-haiti-report-says/; *see also* note 448. The source further noted that Kenyan authorities resisted considering the allegations because they were not reported through the official MSS reporting channels. According to the source, at least as of mid-September, the survivors of the harms had not received any support or compensation, even though one of them became pregnant from the rape and at least one was forced to leave the area due to community stigma.

The circumstances around these SEA allegations against the MSS reflect a profound failure of protection and accountability that violate clear standards and promises. They require thorough investigation and prompt accountability measures, including support for survivors, acknowledgement of any misconduct and policy failing, and appropriate reprecussions for those responsible. These circumstances also raise serious concerns regarding the sufficiency of prevention, monitoring, and accountability mechanisms for the GSF. First, the failures of reporting – from institutional avoidance and opacity, to the resistance expressed towards informal pathways in circumstances characterized by extreme scarcity of information and resources – demonstrate the weaknesses of the ad hoc reporting mechanisms created for both the MSS and the GSF. The lack of support for survivors, who also do not qualify for support from the Trust Fund in Support of Victims of Sexual Exploitation and Abuse because the MSS is not a UN mission (neither is the GSF), is an equally important resulting limitation. *Cf.* Jérôme Wendy Norestyl & Wethzer Piercin, *The Kenyan mission implicated in 4 cases of sexual abuse and exploitation in Haïti*, Ayibo Post (Apr. 2, 2026), https://ayibopost.com/the-kenyan-mission-implicated-in-4-cases-of-sexual-abuse-and-exploitation/ (reporting on explanation by an OHCHR spokesperson that "the UN does not intervene in sanction or reparations mechanisms in cases of human rights violations" because these are not UN forces). Second, the lack of independent oversight over these and related activities and decisions compounds the risks of material conflicts of interest or even just bias impeding full inquiries. *See also, e.g.*, Nathalye Cotrino, *International Force in Haiti Allegedly Responsible for Sexual Violence*, HRW (Apr. 13, 2026), https://www.hrw.org/news/2026/04/13/international-force-in-haiti-allegedly-responsible-for-sexual-violence ("[T]he MSS investigating its own conduct raises concerns about the independence of these findings. The UN Office of Internal Oversight Services would normally independently review allegations involving UN peacekeeping missions, but because the MSS is not considered a UN force, this office has not been engaged."). Third, these violations reveal specific vulnerabilities in the present Haiti context. As the UN Panel of Experts reports, "Petite Rivière de l'Artibonite has been enduring very high levels of armed violence. While many residents have left the area, those who remain are among the most vulnerable. In this context, the deployment of exclusively male battalions in ordinary residential areas, where civilians have easy access to premises, has fallen short of providing the necessary safeguards to prevent sexual exploitation and abuse." UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 80, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714. According to a source, there were substantiated allegations of rape by the police officers deployed together with the MSS in Petite Rivière, where the OHCHR-substantiated MSS rapes occurred. The source further shares that the allegations were known but not shared out to relevant parts of the UN for at least several months in 2025, preventing their integration into the MARA reporting framework and related pathways for supporting the specific survivors and ensuring protection and prevention going forward – especially significant given the interrelated vulnerabilities and opportunities for abuse. This co-deployment also means that reporting any harms to authorities would be especially difficult given police relationships with the foreign troops. In the absence to date of (i) a transparent review into these vulnerabilities and the protection failures and (ii) a robust implementation of corrective actions and property, there is a high risk that additional violations will occur, if they are not taking place already.

[445] A U.S. State Department spokesperson identified the GSF's measures for ensuring prevention and accountability as requiring troop-contributing countries (1) "to promptly investigate sexual abuse and exploitation allegations, cooperate fully with the U.N. and hold perpetrators accountable when abuse are substantiated;" (2) to "do everything possible to prevent their personnel from perpetrating sexual exploitation and abuse against communities they are deployed to protect;" and (3) "to certify that their contingents and units have been vetted and no credible information of prior involvement links them to gross violations of human rights." However, the deference to troop-contributing countries' discretion in substantiating allegations, prevention activities, and certification the lack of independent vetting, reporting, and accountability mechanisms seriously undermine these measures. *See* Jacqueline Charles, *Citing unpunished sex abuse, rights groups urge halt to Sri Lankan troops Haiti deployment*, Miami Herald (Jun. 28, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316286122.html. The lack of sufficient gender considerations in the GSF's mandate relative to that of the MSS raises additional concerns about inability to protect and serve or even abuses against women and girls. *See* IJDH, *Human Rights Update – March 2026*, note 411 (Mar. 2026), https://www.ijdh.org/wp-content/uploads/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf; *see also* CRAT, *"Naming the Harm": A Critical and Multidimensional Analysis of Gender-Based Violence in Haiti*, p. 33 (Apr. 2026), *available at* https://www.linkedin.com/posts/jessica-hsu-38985b47_just-a-short-excerpt-from-our-coarcrat-gbv-ugcPost-7480967675335081985-jhR5 ("If the [GSF] . . . deploys with robust gender safeguards, independent oversight, and genuine engagement with Haitian civil society organizations that understand local dynamics, it could represent a departure from the MINUSTAH model. If it deploys without these protections, the documented patterns of exploitation, self-investigation, and institutional impunity will repeat. The recommendation is not to oppose international security presence but to condition it on the accountability mechanisms that MINUSTAH never had.").

[446] *See* IRC, *2026 Emergency Watchlist*, p. 45 (Dec. 16, 2025), https://www.rescue.org/sites/default/files/2025-12/Watchlist26-Report.pdf ("This new intervention could even drive new levels of harm as civilians are caught in the crossfire between gangs and security forces."); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 80, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714. In light of the demonstrated – and as yet unaddressed – failure of the MSS system described above, *see* note 444, the GSF's lack of clear rules, independent oversight, and increased opportunities for abuse are particularly concerning. Notably, the GSF has indicated it does not view accountability for the SEA perpetrated by the MSS as its responsibility given the GSF's separate mandate, however related, according to a UN official who discussed the issue on background. (Notes on file with authors).

[447] Rhinews, *Haïti : Washington envisage un renforcement de la coordination avec la société de sécurité privée d'Erik Prince…* (Jul. 23, 2026), https://www.rhinews.com/actualites/haiti-washington-envisage-un-renforcement-de-la-coordination-avec-la-societe-de-securite-privee-derik-prince/ (the co-chair of the GSF oversight team "indicated that an officer from the [private security company-supported] Haitian Task Force would be integrated into the joint operations center to formalize cooperation between the various actors," and that as armed groups' influence is reduced, "this partnership [between the GSF and the Haitian Task Force] will strengthen;" a GSF spokesperson clarified that the GSF "does not conduct joint operations with the Haitian Task Force. . . . [but will] coordinate the activities of the various security actors in order to avoid overlapping operations or unnecessary risks"); *see also* notes 120-125 and associated text.

[448] "Between 2004 and 2007, at least 134 Sri Lankan peacekeepers sexually exploited and abused Haitian children, some as young as eight, as revealed by an internal UN report. None of these peacekeepers were imprisoned for sexual assault or misconduct. There is no evidence of any credible, transparent and independent vetting process for troops being considered for the upcoming deployment." Sri Lanka Campaign, *The deploymentof Sri Lankan military to Haiti must be stopped* (Jun. 25, 2026), https://srilankacampaign.org/the-deployment-of-sri-lankan-military-to-haiti-must-be-stopped/ ("A collective of human rights organisations, including the Sri Lanka Campaign for Peace and Justice, is calling for an urgent halt to the deployment of Sri Lankan forces to Haiti."); *see also, e.g.*, Yasmin Sooka & Frances Harrison, *Sri Lanka's Peacekeepers Are Back in Haiti. A Vetting System Is Not*, PassBlue (Sep. 8, 2026), https://passblue.com/2026/09/08/sri-lankas-peacekeepers-are-back-in-haiti-a-vetting-system-is-not/ (detailing previous abuses by Sri Lankan peacekeepers and ongoing problems with vetting processes and accountability in Sri Lanka); Jacqueline Charles, *Citing unpunished sex abuse, rights groups urge halt to Sri Lankan troops Haiti deployment*, Miami Herald (Jun. 28, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316286122.html (organizations opposing the deployment said "[t]he message to the current contingent is that consequences do not follow;" according to the director of the International Truth and Justice Project, advocates have been given very little information about screening processes, but it does not appear as though vetting and accountability in advance of deployment are being taken seriously).

[449] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 90, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("Successive waves of intense armed violence over the reporting period reflect the continued ability and ease of gangs and other non-State armed actors to acquire firearms and, more critically, ammunition."); *id.* at ¶¶ 94-98 (discussing trends in types of firearms trafficked, manufacturers, and methods of trafficking); UN, *Kenscoff Massacre Exposes Worsening Brutality of Haiti's Gang Crisis, Security Council Hears, as Speakers Urge Rapid International Support* (Aug. 28, 2026), https://press.un.org/en/2026/sc16444.doc.htm (Pakistan's delegate to the UN says that "[f]or a secure environment to take hold, the flow of illegal weapons into Haiti must stop") (*internal quotations omitted*); Le Nouvelliste, *UNCOPS 2026 : la PNH appelle à une coopération accrue contre le trafic d'armes* (Jul. 9, 2026), https://lenouvelliste.com/article/269649/uncops-2026-la-pnh-appelle-a-une-cooperation-accrue-contre-le-trafic-darmes (PNH director general Vladimir Paraison "reiterated that the security crisis in Haiti is fueled by transnational networks linked to arms trafficking, drug trafficking, and money laundering"); Harvard Law School International Human Rights Clinic, *Disrupting U.S. arms trafficking to Haiti* (Jun. 2026), https://humanrightsclinic.law.harvard.edu/wp-content/uploads/2026/06/Disrupting-U.S.-Arms-Trafficking-to-Haiti_Policy-Brief26.pdf; UN HRC, *Situation of human rights in Haiti*, UN Doc. A/HRC/61/74, ¶ 8 (Apr. 28, 2026), https://docs.un.org/en/A/HRC/61/74 ("This violence – primarily perpetrated by gangs – is fuelled by the use and threat of firearms. . . . As Haiti does not manufacture weapons or ammunition, these are predominantly illegally trafficked from abroad, despite the arms embargo imposed by UN Security Council resolutions."); Edith M. Lederer, *UN expert: Haiti has a chance now to tackle gang violence as new international force deploys*, Associated Press (Mar. 16, 2026), https://apnews.com/article/un-haiti-gang-suppression-force-us-1e370b6e0fd40ac9dad33751e08c6cea (the UN's independent expert on human rights in Haiti "said the flow of guns and other weapons primarily from the United States must be stopped because then 'the gangs literally run out of bullets, and they lose their strength'").

[450] Harvard Law School International Human Rights Clinic, *Disrupting U.S. arms trafficking to Haiti*, p. 1 (Jun. 2026), https://humanrightsclinic.law.harvard.edu/wp-content/uploads/2026/06/Disrupting-U.S.-Arms-Trafficking-to-Haiti_Policy-Brief26.pdf ("Most weapons entering Haiti are trafficked from the United States, either directly or through intermediary countries."); Roobens Isma, *"Haiti's Main Threat After the Dominican Republic Comes from the U.S.," Says Pierre Antoine Louis*, Le Nouvelliste (Aug. 25, 2026), https://lenouvelliste.com/en/article/271286/haitis-main-threat-after-the-dominican-republic-comes-from-the-us-says-pierre-antoine-louis (former military officer and diplomat Pierre Antoine Louis calls the United States the second largest threat to Haiti because of "the proliferation of weapons, particularly heavy weapons, and ammunition. . . . [that] come 100% from the United States and enter the country either through the various border crossings with the Dominican Republic or through the country's ports"); *see also* UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 41, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("Seizures conducted at ports of exit in the United States and ports of entry in Haiti during the reporting period indicate that trafficking from the United States continues.").

[451] Harvard Law School International Human Rights Clinic, *Disrupting U.S. arms trafficking to Haiti*, pp. 2-3 (Jun. 2026), https://humanrightsclinic.law.harvard.edu/wp-content/uploads/2026/06/Disrupting-U.S.-Arms-Trafficking-to-Haiti_Policy-Brief26.pdf (the U.S. government has "implemented firearms export controls which bar the commercial transfer of firearms to Haiti. . . .[,] sought to deter trafficking by making the straw purchasing of firearms and arms trafficking federal crimes," and made recent efforts to "step up tracing in Haiti," including through the ARMAS Act, which is pending in Congress and "would mandate the State Department to work with ATF [U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives] to increase international participation in the eTrace system, require availability of the system in French and Haitian Creole, and promote use by partners like the Haitian government," thereby allowing "U.S. law enforcement to identify, investigate, and ultimately prosecute a greater number of dealers and purchasers who are involved in illicit weapons sales and trafficking"); UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 8, 102-104, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (noting seizures of rifles and ammunition destined for Haiti by CBP, as well as ongoing investigations and prosecution of traffickers); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 52, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 (reporting "an increase in

seizures from air freight at airports in the United States and in Haiti" between September 2025 and March 2026); *see also, e.g.*, Alterpresse, *Trafic d'armes vers Haïti : Un ancien policier haïtien naturalisé américain plaide coupable* (Aug. 5, 2026), https://www.alterpresse.org/Trafic-d-armes-vers-Haiti-Un-ancien-policier-haitien-naturalise-americain-plaide-coupable (a naturalized U.S. citizen and former PNH officer was charged with trafficking arms to Haiti in Jaunary 2025 and pled guilty in August 2026).

[452] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 8-9, 90-92, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (expressing concern about "weaknesses and gaps in inspection and enforcement mechanisms" in the United States, with efforts "largely insufficient given the scale of the challenge;" and noting that trafficking networks "display a striking degree of confidence and take few measures to cover their tracks," indicating "a perception of low risk among traffickers of the likelihood of interdiction"); Harvard Law School International Human Rights Clinic, *Disrupting U.S. arms trafficking to Haiti*, pp. 2-3(Jun. 2026), https://humanrightsclinic.law.harvard.edu/wp-content/uploads/2026/06/Disrupting-U.S.-Arms-Trafficking-to-Haiti_Policy-Brief26.pdf (among the challenges are U.S. Customs and Border Protection (**CBP**) failures to regularly scan outgoing shipments, and a tracing system that depends on Haitian law enforcement partners but is not available in French or Kreyòl).

[453] UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 8-9, 90-92, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("The Panel is concerned about the weaknesses and gaps in inspection and enforcement mechanisms in . . . Haiti, as well as the complicity of corrupt Haitian customs and law enforcement officials in facilitating the movement of illicit shipments by air and sea."); *id.* at ¶¶ 99-101 ("While traffickers were arrested and some investigations were launched [in Haiti], limited resources, pervasive corruption and the absence of effective protection for officers willing to act, consistently prevent meaningful judicial outcomes."); BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April–June 2026)*, pp. 21-22 (Aug. 25, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Q2%202026%20-%20EN-V3.pdf (reporting progress in one arms trafficking case in Haiti, while another remains stalled); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 52, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 (reporting several seizures of weapons at ports of entry in Haiti); *see also* Sections III and IV.

[454] For a full list of foreign sanctions imposed against Haitian individuals and entities, see IJDH, *Foreign Sanctions Against Haitian Individuals (December 2020 – Present)*, https://docs.google.com/document/d/1RG0k34CaID3QmxHt1XW-S_C8Aeyj9Vum1qkhtmiopdo/edit?tab=t.0 (last visited Oct. 19, 2026); *see also* BINUH, *Quarterly Report on the Human Rights Situation in Haiti (April–June 2026)*, p. 23 (Aug. 25, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Q2%202026%20-%20EN-V3.pdf.

[455] The U.S. Department of State designated Viv Ansanm and Gran Grif as Foreign Terrorist Organizations and Specially Designated Global Terrorists. U.S. Department of State, *Terrorist Designations of Viv Ansanm and Gran Grif* (May 2, 2025), https://www.state.gov/releases/office-of-the-spokesperson/2025/05/terrorist-designations-of-viv-ansanm-and-gran-grif; Office of Foreign Assets Control, *Counter Terrorism Designations* (May 2, 2025), https://ofac.treasury.gov/recent-actions/20250502.

[456] For example, in 2025, the Haitian government promised to freeze assets of and initiate financial investigations into sanctioned individuals. However, the commitment only applied to individuals sanctioned under the UN regime, thereby excluding the vast majority of sanctioned individuals, and there has been very little progress made on implementation. UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶¶ 10-12, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 (noting that "the absence of a national coordinated process to identify and freeze assets of individuals sanctioned by the United Nations, . . . erodes the impact of the sanctions regime in Haiti"); Alterpresse, *Haïti : L'ambassadeur français Antoine Michon alerte sur l'imbrication entre criminalité et sphère politique* (Aug. 3, 2026), https://www.alterpresse.org/Haiti-L-ambassadeur-Antoine-Michon-alerte-sur-l-imbrication-entre-criminalite-et-sphere-politique (then-French Ambassador to Haiti Antoine Michon notes the lack of follow-up by Haitian authorities on proises to freeze assets and open financial investigations into sanctioned individuals: "the justice system is not fully exercising its oversight powers, particularly by ordering the verification of assets of individuals suspected of links with criminal networks"); Haiti Libre, *UN visit to assess Haiti's implementation of the sanctions regime* (Jul. 27, 2026), https://www.haitilibre.com/en/news-48080-un-visit-to-assess-haiti-s-implementation-of-the-sanctions-regime.html (reporting that the UN is undertaking out "a series of consultations . . . with the relevant Haitian authorities to assess Haiti's implementation of the sanctions regime established by the United Nations Security Council"); IJDH, *Human Rights Update – July 2025*, p. 13 (Jul. 2025), https://www.ijdh.org/wp-content/uploads/HRU-July-2025.pdf; *see also* UNSC, *Final report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 14, UN Doc. S/2026/714 (Sep. 8, 2026), https://docs.un.org/en/S/2026/714 ("[P]ersistent fraud in the issuance of Haitian passports in the country. . . . increase[s] the risk of sanctioned individuals obtaining multiple passports and travelling under false identities to circumvent the travel ban."); OHCHR, *High Commissioner Türk: We need all eyes on Haiti* (Oct. 2, 2026), https://www.ohchr.org/en/statements-and-speeches/2026/10/high-commissioner-turk-we-need-all-eyes-haiti (emphasizing that sanctions "need to be matched by accountability on the ground to strengthen their practical impact"); Miami Herald, *Haiti farming region once more site of gang massacre: Homes burned, residents killed* (Mar. 31, 2026) https://www.miamiherald.com/news/nation-world/world/americas/haiti/article315232119.html (the U.S. designation of *Gran Grif* as a terrorist organization, "United Nations sanctions against its leader, and a recent $3 million bounty offered by the United States have failed to slow its terror"); Rhinews, *Saint-Michel-de-l'Attalaye : une attaque armée à Marmont fait au moins un mort et trois blessés par balles…* (Sep. 16, 2026), https://www.rhinews.com/actualites/saint-michel-de-lattalaye-une-attaque-armee-a-marmont-fait-au-moins-un-mort-et-trois-blesses-par-balles/.

[457] OHCHR, *High Commissioner Türk: We need all eyes on Haiti* (Oct. 2, 2026), https://www.ohchr.org/en/statements-and-speeches/2026/10/high-commissioner-turk-we-need-all-eyes-haiti ("Many gang leaders are subject to international sanctions. Those sanctions also need to cover all those pulling the strings behind criminal networks and benefiting from them."); UN, *Kenscoff Massacre Exposes Worsening Brutality of Haiti's Gang Crisis, Security Council Hears, as Speakers Urge Rapid International Support* (Aug. 28, 2026), https://press.un.org/en/2026/sc16444.doc.htm ("France's delegate [to the UN] said that. . . . [s]anctions must be extended to individuals who provide political or financial support to the gangs."); BINUH, *Quarterly Report*

on the Human Rights Situation in Haiti (April–June 2026), p. 23 (Aug. 25, 2026), https://binuh.unmissions.org/sites/default/files/2026-08/Q2%202026%20-%20EN-V3.pdf (UN sanctions target two armed groups and seven armed group leaders, but just two former senior officials); *see also* Widlore Mérancourt & Wethzer Piercin, *Why Fils-Aimé Dismissed the Head of Haiti's Anti-Corruption Agency*, AyiboPost (Jul. 5, 2026), https://ayibopost.com/why-fils-aime-dismissed-the-head-of-haitis-anti-corruption-agency/ ("Last April, U.S. Chargé d'Affaires Henry Wooster told AyiboPost that it was necessary to « stop demonizing » Haiti's private sector in response to a question about a meeting between the U.S. Embassy and businessman Reynold Deeb, who has been sanctioned by Canada for corruption and ties to armed gangs.").

[458] *See* Juhakenson Blaise, *Former President Martelly returns to Haiti after judicial summons in Moïse assassination case*, Haitian Times (Jul. 16, 2026), https://haitiantimes.com/2026/07/16/michel-martelly-returns-haiti-jovenel-moise-investigation/ (Martelly arrived "to a welcome by supporters that included a rara band and a police escort that critics said contrasted sharply with the allegations and legal controversies surrounding him," with many "arguing that a former president facing multiple legal controversies and international sanctions should not have been welcomed as a national figure"); AlterPresse, *Michel Martelly revient en Haïti dans un contexte d'instabilité politique persistante* (Jul. 15, 2026), https://www.alterpresse.org/Michel-Martelly-revient-en-Haiti-dans-un-contexte-de-tensions-politiques; *see also* IJDH, *Human Rights Update – July 2025*, notes 485-486 (Jul. 2025), https://www.ijdh.org/wp-content/uploads/HRU-July-2025.pdf; notes 32-33.

[459] ALNAP, *The State of the Humanitarian System*, pp. 3, 56 (Sep. 10, 2026), https://alnap.hacdn.io/media/documents/SOHS_report_interactive_5.pdf (Haiti's humanitarian response is among the world's least-funded); IRC, *2026 Emergency Watchlist*, p. 45 (Dec. 16, 2025), https://www.rescue.org/sites/default/files/2025-12/Watchlist26-Report.pdf ("Half the population is in desperate need of life-saving assistance, yet funding doesn't even reach a quarter of humanitarian requirements."); Jovani Davis, *UN warns of new displacement crisis in Haiti as violence forces more than 1,100 people to flee*, News Caribbean Haiti (Jun. 2, 2026), https://www.caribbeannationalweekly.com/posts/un-warns-of-new-displacement-crisis-in-haiti-as-violence-forces-more-than-1100-people-to-flee (UN spokesman Stéphane Dujarric notes that "pace and the scale of needs are rising rapidly") (*internal quotations omitted*); Daniel Dickinson, *Haiti: Signs of hope despite gang violence and political uncertainty*, UN News (Jul. 19, 2026), https://news.un.org/en/story/2026/07/1167963 ("More than half the country's population of around 11 million now needs relief aid. . . . The 2026 humanitarian appeal is critically underfunded. By mid-June, only 25 per cent of the required $880 million had been received, limiting life-saving operations."); UN News, *Haiti's freefall demands urgent global action as millions face hunger and violence* (Apr. 10, 2026), https://news.un.org/en/story/2026/04/1167283 (the Director of OCHA's Crisis Response Division says "aid is collapsing" in Haiti) (*internal quotations omitted*); *see also* Jess Obert, *US Funding Cuts Fuel Child Recruitment Into Haitian Armed Groups*, New Humanitarian (Aug. 19, 2026), https://www.thenewhumanitarian.org/news-feature/2026/08/19/us-funding-cuts-fuel-child-recruitment-haitis-armed-group (analyzing the impacts of massive cuts to U.S. foreign aid in 2025 on humanitarian funding for Haiti); Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees ("Asked whether the [U.S.] State Department had a plan to seek additional funding for humanitarian needs—food, medical care, clean water—Ambassador Michael Kozak, the State Department's most senior official for Western Hemisphere affairs, told the House Foreign Affairs Committee in July that he was 'not aware that there is a big gap' in funding, noting that he frequently signs off on grants for humanitarian assistance. And yet, the United Nations' 2026 humanitarian response plan for Haiti was only 47 percent funded as of early September.").

[460] Financial Tracking Service, *Haiti 2025*, https://fts.unocha.org/countries/96/summary/2026 (last visited Oct. 19, 2026) (reporting 49.1% funded).

[461] *See* Jacqueline Charles, *Chadian troops arrive in Haiti as cops say they arrest Floridian who had AR-15*, Miami Herald (Sep. 19, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article317307251.html ("[T]he nutrition sector under the Haiti Humanitarian Response Plan remains severely underfunded. Of the $41 million that the U.N. is asking for, only $7.5 million — less than 20% — has been received."); UNFPA, *Situation Report, Haiti: Displacement from escalation in gang violence, 1 July - 31 August 2026* (Sep. 2026), https://www.unfpa.org/resources/situation-report-crisis-haiti-july-august-2026 ("UNFPA requires US$32.8 million to strengthen and expand access to life-saving reproductive health and protection services in Haiti. As of August, only US$4 million—just 12 per cent of the total funding required—had been received. As humanitarian needs continue to escalate, urgent additional funding is needed to sustain and expand these critical services for women and girls."); UNICEF, *Nearly one in thirteen children under five suffer from acute malnutrition in Haiti* (Aug. 28, 2026), https://www.unicef.org/press-releases/nearly-one-thirteen-children-under-five-suffer-acute-malnutrition-haiti ("UNICEF is urgently calling for increased support to address a funding gap of more than 64 per cent for nutrition interventions under its 2026 Humanitarian Action for Children (HAC) appeal."); Jess Obert, *US Funding Cuts Fuel Child Recruitment Into Haitian Armed Groups*, New Humanitarian (Aug. 19, 2026), https://www.thenewhumanitarian.org/news-feature/2026/08/19/us-funding-cuts-fuel-child-recruitment-haitis-armed-group (discussing how cuts to foreign aid "gutted the programming designed to keep young people out of the armed groups: job training, income support, education, and community mediation," thereby enabling increased armed group recruitment and furthering the cycles of violence); UNICEF, *Haiti Humanitarian Situation Report No. 2*, pp. 1-2 (Aug. 11, 2026), https://www.unicef.org/media/183661/file/Haiti-Humanitarian-Situation-Report-No.%202(Mid-Year),30-June-2026.pdf.pdf ("Funding shortfalls [for the 2026 Humanitarian Action for Children appeal] persist across all programme sectors, with particularly critical gaps in education, emergency preparedness and WASH."); Jacqueline Charles, *Aid cuts forcing women's groups worldwide to close. In Haiti, they are feeling the toll*, Miami Herald (Jul. 10, 2026), https://www.miamiherald.com/news/nation-world/world/americas/haiti/article316461717.html (the staff of an organization serving women and girls with disabilities "has been working without pay" since funding from the United States Agency for International Development ended last year, and the organization itself is on the verge of having to close); FEWS, *Haiti - Food Security Outlook Update*, p. 3 (May 21, 2026), https://fews.net/latin-america-and-caribbean/haiti/food-security-outlook-update/april-2026/print ("Assistance continues to be irregular and provided for only short time periods, while the value of transfers or food rations remains below monthly food needs. . . . In this context, food and nutrition assistance continues to have only a limited impact in mitigating food security outcomes, particularly in areas most affected by insecurity and internal

displacement. . . . [I]nterventions [by humanitarian actors] remain targeted and sporadic and are still largely insufficient given the millions of people facing acute food insecurity."); UN Women, *Beyond the Breaking Point: the continuing impacts of funding cuts on women's organizations in humanitarian settings*, pp. 27, 35 (2026), https://www.unwomen.org/sites/default/files/2026-07/beyond-the-breaking-point-the-continuing-impact-of-funding-cuts-on-womens-organizations-in-humanitarian-settings-en.pdf (funding cuts in 2025 reduced the staff of a women-led shelter "from 14 to as few as 4, forcing several projects to end" and resulting in direct harm to the communities they serve; in another women-led organization, "[s]ome staff have gone three or four months without receiving salaries"); FAO & WFP, *Hunger Hotspots, FAO-WFP early warnings on acute food insecurity, June to November 2026 outlook* (2026), https://docs.wfp.org/api/documents/WFP-0000174369/download/ p. 11 ("Examples of the consequences of funding cuts include . . . reduced protection support and food assistance for displaced people in Haiti. . . . Preparedness has also weakened, including reduced contingency stocks in Haiti, and these impacts are expected to continue and likely worsen in 2026."); IRC, *2026 Emergency Watchlist*, p. 45 (Dec. 16, 2025), https://www.rescue.org/sites/default/files/2025-12/Watchlist26-Report.pdf ("Cuts to funding are at risk of leaving 1.7 million people without aid amid a substantial risk in 2026 from the mid-year hurricane season.").

[462] *See* Sam Vigersky, *On the Ground in Haiti: The Growing War Zone Facing U.S. Deportees*, CFR (Sep. 14, 2026), https://www.cfr.org/articles/on-the-ground-in-haiti-the-growing-war-zone-facing-u-s-deportees ("This dearth of funding more than shrinks services; it corrodes the relationship between health workers and the communities they serve. Patients have begun to accuse hospital staff of taking the benefits that they used to receive. The loss of these services, combined with inflation and a crippled economy, has made the patient-provider relationship more hostile.").

[463] Alexia Gardner, *Haiti is Not Safe: Country Conditions 2026*, U.S. Committee for Refugees and Immigrants (Aug. 12, 2026), https://refugees.org/haiti-is-not-safe-country-conditions-2026/ ("Few humanitarian organizations have a presence on the ground in Port-au-Prince anymore."); Alterpresse, *Haïti-Humanitaire-Aviation : Reprise des vols de l'Onu vers Port-au-Prince après une suspension liée aux restrictions de la Faa* (Jun. 2, 2026), https://www.alterpresse.org/Haiti-Humanitaire-Aviation-Reprise-des-vols-de-l-ONU-vers-Port-au-Prince-apres-une-suspension-liee-aux-restrictions-de (the UN Humanitarian Air Service was forced to suspend its operations for a week in March after the U.S. Federal Aviation Administration imposed restrictions on operators, resulting in severe disruptions to humanitarian links across the country as "air transport often remains the only safe means of access for humanitarian organizations due to insecurity on the main roads"); IOM, *Haiti: Violence and Displacement in the Artibonite Department (Situation Report as of 17 April 2026)* (Apr. 20, 2026), https://www.unocha.org/publications/report/haiti/haiti-violence-and-displacement-artibonite-department-situation-report-17-april-2026 ("Persistent insecurity continues to restrict humanitarian access in several areas, particularly in parts of the Dessalines commune, notably the Ogé section. . . . the World Food Programme (WFP) was forced to suspend planned distributions for approximately 60,000 beneficiaries across four communes in Artibonite, affecting the continuity of food assistance."); OCHA, *Haiti: Nationwide Humanitarian Response Situation Report No.1 – 1 February – 31 March 2026* (Apr. 10, 2026), https://www.unocha.org/publications/report/haiti/haiti-overview-humanitarian-response-national-level-situation-report-no-1-february-march-2026 (noting that "armed violence severely restricts access to essential services and significantly hampers humanitarian operations" in the West, Centre, and Artibonite Departments); UNSC, *Interim report of the Panel of Experts on Haiti submitted pursuant to resolution 2794 (2025)*, ¶ 36, UN Doc. S/2026/241 (Mar. 27, 2026), https://docs.un.org/en/S/2026/241 ("[P]ersistent threats and attacks perpetrated against humanitarian actors . . . severely undermine the delivery of life-saving aid to affected populations."); PAHO, *Haiti Humanitarian Crisis - Grade 3*, https://www.paho.org/en/haiti-humanitarian-crisis-grade-3 (last visited Oct. 19, 2026) ("Insecurity and blockades of ports and airports is significantly limiting foreign assistance to provide vital health supplies and medication."); *see also* note 159.

[464] *See* UN News, *Haiti's freefall demands urgent global action as millions face hunger and violence* (Apr. 10, 2026), https://news.un.org/en/story/2026/04/1167283; *see also* IJDH, *Human Rights Update – July 2025*, note 488 (Jul. 2025), https://www.ijdh.org/wp-content/uploads/HRU-July-2025.pdf (reporting concerns that U.S. designations of certain armed groups as terrorist organizations could put humanitarian actors who are forced to negotiate with them at risk of criminal penalties).

[465] For example, a US$125 million disbursement into the UN's Regional Pooled Fund for Haiti, which the United States began disbursing in March 2026, "may seem . . . [to] offer a much-needed lifeline to communities facing extreme hardship, [but] the structure and timeline of this funding risk both prolonging the crisis and undermining Haiti's long-term ability to recover from it." FCHLD, *Emergency Funding or Entrenched Dependency?* (Mar. 5, 2026), https://haitifunders.substack.com/p/emergency-funding-or-entrenched-dependency ("From decades of working in Haiti, the members of our Coalition have seen time and time again how foreign-, donor-led projects like these undermine local leadership, create competition for limited resources, decimate domestic industry, funnel resources into the gangs, and break down the fabric of Haitian society. The projects undertaken with these funds will likely exacerbate this long-term damage, violating the core mandate of humanitarian intervention–to do no harm."); *see also generally* Jake Johnston, *Aid State: Elite Panic, Disaster Capitalism, and the Battle to Control Haiti* (2024).