

individuals for involvement in CRSV.⁴⁴ In a statement, President Biden noted that this marked “the first time that a dedicated focus on conflict-related sexual violence has led to the imposition of U.S. sanctions.”⁴⁵

INTERNATIONAL CRIMINAL LAW

The United States Arrests and Charges Eleven in Connection with the Assassination of Haiti’s President

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U.S. federal law enforcement has charged eleven men in connection with the July 7, 2021, assassination of Haitian President Jovenel Moïse at his home in Port-au-Prince.¹ Arrested between January 2022 and February 2023, the men include Colombian, Haitian, U.S., dual Haitian-Chilean, and dual U.S.-Haitian nationals. According to prosecutors, the accused hatched, developed, and advanced the plan while operating in the United States.

⁴⁴ See U.S. Dep’t of the Treasury Press Release, Treasury Sanctions Two South Sudanese Officials Responsible for Conflict-Related Sexual Violence (June 20, 2023), at <https://home.treasury.gov/news/press-releases/jy1552> [<https://perma.cc/62L7-ACWY>] [hereinafter Treasury Sanctions Two South Sudanese Officials]; U.S. Dep’t of State Press Release, Designating and Promoting Accountability for Conflict-Related Sexual Violence (June 20, 2023), at <https://www.state.gov/designating-and-promoting-accountability-for-conflict-related-sexual-violence> [<https://perma.cc/9M7A-YURC>].

⁴⁵ White House Press Release, Statement from President Joe Biden on New Steps Against Perpetrators of Sexual Violence in Conflict (June 20, 2023), at <https://www.whitehouse.gov/briefing-room/statements-releases/2023/06/20/statement-from-president-joe-biden-on-new-steps-against-perpetrators-of-sexual-violence-in-conflict> [<https://perma.cc/2CKX-T8F9>].

¹ U.S. Dep’t of Justice Press Release, Four Florida Men Arrested in Plot to Kill Haitian President, Grand Jury Returns Indictment Against 11 (Feb. 14, 2023), at <https://www.justice.gov/opa/pr/four-florida-men-arrested-plot-kill-haitian-president-grand-jury-returns-indictment-against> [<https://perma.cc/KYU5-4HTC>] [hereinafter Four Florida Men Arrested]. The narrative in this and the following paragraphs is based on government allegations and news stories. See Third Superseding Indictment, Case No. 22-20104-CR, United States v. Ortiz et al. (SD Fl. Feb. 14, 2023) [hereinafter Third Superseding Indictment]; Criminal Complaint, Case No. 1:23-mj-02256, United States v. Ortiz, Intriago, and Veintemilla (SD Fl. Feb. 13, 2023) [hereinafter Criminal Complaint]; Criminal Complaint, Case No. 22-mj-02251, United States v. John (SD Fl. Feb. 23, 2023); Criminal Complaint, Case No. 23-mj-02178, United States v. Solages, Vincent, and Garcia (SD Fl. Jan. 31, 2023); Criminal Complaint, Case No. 22-mj-04161, United States v. Sanon (SD Fl. Dec. 20, 2022); Criminal Complaint, Case No. 23-mj-02257, United States v. Bergmann (SD Fl. Feb. 13, 2023); Criminal Complaint, Case No. 21-mj-04265, United States v. Palacios Palacios (SD Fl. Nov. 24, 2021); Criminal Complaint, Case No. 22-mj-02070, United States v. Jaar (SD Fl. Jan. 19, 2022); Four Florida Men Arrested, *supra*; U.S. Dep’t of Justice Press Release, Additional Four Charged in Connection with Plot to Kill Haitian President (Jan. 31, 2023), at <https://www.justice.gov/opa/pr/additional-four-charged-connection-plot-kill-haitian-president> [<https://perma.cc/T8SW-63LB>] [hereinafter Additional Four Charged]; U.S. Dep’t of Justice Press Release, Third Man Charged in Connection with Plot to Kill Haitian President (May 9, 2022), at <https://www.justice.gov/opa/pr/third-man-charged-connection-plot-kill-haitian-president> [<https://perma.cc/2WXA-JU56>]; U.S. Dep’t of Justice Press Release, Second Man Charged in Connection with Plot to Kill Haitian President (Jan. 20, 2022), at <https://www.justice.gov/opa/pr/second-man-charged-connection-plot-kill-haitian-president> [<https://perma.cc/69P4-T73A>]; U.S. Dep’t of Justice Press Release, Colombian National Charged in Connection with Plot to Kill Haitian President (Jan. 4, 2022), at <https://www.justice.gov/opa/pr/colombian-national-charged-connection-plot-kill-haitian-president> [<https://perma.cc/D3BA-FJQ4>]; Jacqueline Charles, *Made in Miami: How a South Florida Plot to Oust Haiti’s Jovenel Moïse Led to His Murder*, MIAMI HERALD (Dec. 8, 2022), at <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article264470076.html>.

Marking the culmination of the investigation, Attorney General Merrick Garland said that “[t]he Justice Department will not tolerate individuals plotting violent attacks from U.S. soil that undermine the rule of law abroad.”² “These defendants thought they could secure Haitian immunity for their crimes,” stated Assistant Attorney General for National Security Matthew G. Olsen. “We will now deliver justice in a U.S. courtroom.”³ A Haitian investigation has stalled, part of a broad breakdown in governmental authority there since the assassination that has led to a humanitarian crisis and a request in October 2022 by Haitian Prime Minister Ariel Henry, himself accused of participating in the plot, for an international intervention.

The Justice Department alleges that the eleven defendants, working with others in Haiti, some still at-large, planned to “remove President Moïse from office by either killing or kidnapping him in order to replace him with a candidate who would serve their political goals and financial interests.”⁴ The men, four of whom were found in the United States and seven of whom were transferred from other countries (including Haiti), include: Frederick Bergmann, Antonio Intriago, Rodolphe Jaar, Joseph Joel John, Arcangel Pretel Ortiz, Mario Antonio Palacios, German Alejandro Rivera Garcia, Christian Emmanuel Sanon, James Solages, Walter Veintemilla, and Joseph Vincent.

The indictment alleges that in early 2021 Intriago and Ortiz, who operated the south Florida private security companies Counter Terrorist Unit Federal Academy and Counter Terrorist Unit Security (CTU), and Sanon, a Haitian-American doctor and pastor, entered into discussions about replacing President Moïse with Sanon, who had political aspirations. CTU soon agreed to support him. In March 2021, CTU made Solages its operative in Haiti, and in April several defendants, including Intriago, John (a former Haitian senator), Ortiz, Sanon, Solages, and Veintemilla, met in Florida and agreed on a scheme. They allegedly “planned to foment a public uprising aimed at ousting President Moïse and installing Sanon as President.”⁵ Veintemilla, who was the principal of the south Florida financial services company Worldwide Capital Lending Group, agreed to finance CTU’s support of the conspiracy and provide CTU with a line of credit. Ortiz, Intriago and Veintemilla “expected to reap significant financial benefits should Sanon secure the Presidency, largely [through the award of government contracts for] sizeable infrastructure projects in Haiti . . . [and] for the provision of security forces . . . and military-type equipment to a Sanon-led Haitian government.”⁶ The Haitians involved, including those not charged by the United States, anticipated political power and financial gain if the coup succeeded.

Realizing, eventually, “that Sanon had neither the constitutional [residency] qualifications nor the popular support of the Haitian people to become president[,] . . . [t]he conspirators shifted their support to . . . former Supreme Court judge [Wendelle Coq Thélot]” who then “contracted [with them] to serve their financial interests . . . [once the judge] was installed as

² Four Florida Men Arrested, *supra* note 1.

³ U.S. Dep’t of Justice Press Release, Assistant Attorney General for National Security Matthew G. Olsen Delivers Remarks on Haitian President Assassination Prosecution (Feb. 14, 2023), at <https://www.justice.gov/opa/speech/assistant-attorney-general-national-security-matthew-g-olsen-delivers-remarks-haitian> [<https://perma.cc/CQY7-5A9P>].

⁴ Four Florida Men Arrested, *supra* note 1.

⁵ Criminal Complaint, *supra* note 1, para. 6.

⁶ *Id.*

President.”⁷ Justice Coq Thélot, who remains wanted by Haitian authorities, also allegedly agreed to “provide immunity in Haiti to those who participated in the operation.”⁸ Attempts to kidnap the president (in accordance with the original plot) failed, and the plan changed to using previously hired Colombian nationals to assassinate President Moïse. Intriago and Ortiz directed the conspiracy. Solages served as a CTU’s contact in Haiti and coordinated with Sanon and Vincent. Rivera, Solages, Vincent, and others led the operation on the ground. Jaar and John worked to obtain weapons and provided additional support. Bergmann and Sanon allegedly helped fund the assassins’ lodgings and sent CTU-branded ballistic vests to Haiti. Others in Haiti not identified in the indictment were also involved. Moïse was killed, but the plot to take control of the government failed. Some of the assassins and conspirators were arrested in Haiti, some were killed by Haitian police, some escaped to other countries but were captured, and some fled and are still wanted.

Bergmann and Sanon have been charged in federal court with: conspiracy to commit export violations; submitting false and misleading export information; and smuggling ballistic vests from the United States to Haiti.⁹ They could receive up to twenty years in prison. The other defendants were charged with: conspiracy to provide material support and resources to a conspiracy to kidnap or kill outside the United States, resulting in death; providing material support and resources to a conspiracy to kidnap or kill outside the United States, resulting in death; and conspiracy to kill or kidnap a person outside the United States.¹⁰ They potentially face sentences of life in prison.

The U.S. prosecution contrasts with the Haitian investigation, which has all but collapsed.¹¹ This has stemmed, in part, from the refusal of some Haitian officials to participate or continue to participate in the investigation.¹² One investigative judge agreed to work on the case, but then withdrew citing personal reasons after his judicial clerk died.¹³ The longest-serving investigative judge on the case stepped down after his car was shot at and he was accused of corruption.¹⁴ His successor relinquished the case after reporting a similar fear for his safety and that of his family.¹⁵ There were also efforts to interfere with the investigation, including break-ins at the offices of the investigating judges, tampering with evidence, and the removal of the chief prosecutor.¹⁶ Secretary of State Antony Blinken remarked: “Haitian authorities have not adequately addressed the judiciary’s calls for stronger

⁷ *Id.*, para. 7. The judge is not identified by name in the indictment, but newspaper reports identify her.

⁸ Additional Four Charged, *supra* note 1.

⁹ See Third Superseding Indictment, *supra* note 1, Counts 4–6.

¹⁰ See *id.*, Counts 1–3. On March 24, 2023, Jaar pleaded guilty to all three counts. He admitted to providing funds to purchase weapons and bribe officials, supplying food and lodging to those involved, and permitting the use of his property for the staging of the operation. See Zach Montague, *Man Pleads Guilty in Case Related to Assassination of Haiti’s President*, N.Y. TIMES (Mar. 24, 2023), at <https://www.nytimes.com/2023/03/24/us/politics/rodolphe-jaar-jovenel-moise-plot.html>.

¹¹ See Anatoly Kurmanav, *Haitians Investigating President’s Death, Under Threat, Go Into Hiding*, N.Y. TIMES (Aug. 2, 2021), at <https://www.nytimes.com/2021/08/02/world/americas/haiti-jovenel-moise-killing.html>.

¹² See Report to Congress on the Assassination of Former President of Haiti Jovenel Moïse Section 108(a) of the Haiti Development, Accountability, and Institutional Transparency Initiative Act, 2022 (Div. V, P.L. 117-103), at 2 (Oct. 2022), at <https://www.state.gov/wp-content/uploads/2022/11/Report-Haiti-Moi%CC%88se-Assassination-004870.pdf> [<https://perma.cc/38WA-KUFD>].

¹³ *Id.*

¹⁴ *Id.* at 2–3.

¹⁵ *Id.* at 3.

¹⁶ *Id.*; Maria Abi-Habib & Anatoly Kurmanav, *Haiti Prosecutor Says Evidence Links Prime Minister to President’s Killing*, N.Y. TIMES (Sept. 14, 2021), at <https://www.nytimes.com/2021/09/14/world/americas/haiti-henry-moise-assassination.html>.

security measures to protect judicial workers assigned to the case and to preserve the chain of custody of key evidence.”¹⁷ Haitian government officials were suspects as well. Prime Minister Henry said he would do everything he could to bring justice, including turning over individuals to the United States, but he himself was accused of being involved.¹⁸ Forty-five persons are currently detained in Haiti in connection with the assassination, including eighteen Colombians and twenty police officers.¹⁹

Security and the rule of law, already tenuous, further declined following the assassination, and conditions worsened after the government cut fuel subsidies in early September 2022 and gangs blockaded the country’s primary oil terminal.²⁰ A March 2023 report by the UN Office on Drugs and Crime concluded that “[v]irtually every metric of insecurity, from homicide, sexual violence and kidnapping to the killing of police and migration out of the country—is trending upward.”²¹ A report by the United Nations Office for the Coordination of Humanitarian Affairs found that “[n]early half the population is now hungry and, for the first time in Haiti’s history, at least 19,000 people are threatened with starvation.”²² Cholera is resurgent.²³ More than 165,000 people are internally displaced.²⁴ Many undocumented Haitians have attempted to enter the United States, with U.S. Customs and Border Patrol reporting approximately 160,000 encounters from July 2021 to June 2023 and the U.S. Coast Guard logging nearly 12,000 encounters from October 2021 to May 2023.²⁵

¹⁷ U.S. Dep’t of State Press Release, Statement on the Anniversary of Haitian President Jovenel Moïse’s Assassination (July 7, 2022), at <https://www.state.gov/statement-on-the-anniversary-of-haitian-president-jovenel-moise-assassination> [https://perma.cc/CF5Q-GX3M].

¹⁸ See Widlore Mérancourt, Amanda Coletta, Claire Parker & Samantha Schmidt, *Haiti’s Assassination Probe Has Stalled. the U.S. One Is Advancing*, WASH. POST (Apr. 8, 2022), at <https://www.washingtonpost.com/world/2022/04/08/haiti-moise-assassination-investigation>; Anatoly Kurmanaev, *Haitian Prime Minister Had Close Links With Murder Suspect*, N.Y. TIMES (Jan. 10, 2022), at <https://www.nytimes.com/2022/01/10/world/americas/haitian-prime-minister-assassination-suspect.html>.

¹⁹ See Office of the High Commissioner for Human Rights & UN Integrated Office in Haiti, Human Rights Situation in Haiti – Main Trends – Quarterly Report: January – March 2023, at 6 (May 8, 2023), at <https://www.ohchr.org/sites/default/files/documents/countries/haiti/Haiti-Human-rights-quarterly-report-Q1-2023-EN.pdf>.

²⁰ See U.S. Dep’t of State Bureau of Conflict and Stability Operations, The U.S. Strategy to Prevent Conflict and Promote Stability 10-Year Strategic Plan for Haiti (Mar. 24, 2023), at <https://www.state.gov/the-u-s-strategy-to-prevent-conflict-and-promote-stability-10-year-strategic-plan-for-haiti> [https://perma.cc/Z7J9-Q93Y].

²¹ UN Office on Drugs and Crime, Haiti’s Criminal Markets: Mapping Trends in Firearms and Drug Trafficking (2023), at https://www.unodc.org/documents/data-and-analysis/toc/Haiti_assessment_UNODC.pdf [https://perma.cc/BJ6Z-PJCG].

²² United Nations Office for the Coordination of Humanitarian Affairs, Humanitarian Needs Overview Haiti 4 (Mar. 2023), available at <https://reliefweb.int/attachments/b6680e0c-c417-43bd-a6e5-013cec73ea82/HNO%20HAITI%202023%20EXECUTIVE%20SUMMARY%20ENG%20%281%29.pdf>.

²³ See Pan American Health Organization, Cholera Epidemic in Haiti and the Dominican Republic (May 16, 2023), at <https://www.paho.org/en/file/127822/download?token=2YL3JP6>.

²⁴ See International Organization for Migration Press Release, Gang Violence Displaces 165,000 in Haiti, Hinders Aid Efforts (June 8, 2023), at <https://www.iom.int/news/gang-violence-displaces-165000-haiti-hinders-aid-efforts> [https://perma.cc/S3XK-4JBF].

²⁵ See U.S. Customs and Border Patrol, Nationwide Encounters, at <https://www.cbp.gov/newsroom/stats/nationwide-encounters>; U.S. Coast Guard Press Release, Coast Guard Repatriates 49 People to Haiti (Mar. 3, 2023), at <https://www.news.uscg.mil/Press-Releases/Article/3316146/coast-guard-repatriates-49-people-to-haiti> [https://perma.cc/9BMH-N6CC]; U.S. Coast Guard Press Release, Coast Guard Repatriates, Transfers 259 People to Haiti, Cuba, Bahamas (May 4, 2023), at <https://www.news.uscg.mil/Press-Releases/Article/3385561/coast-guard-repatriates-transfers-259-people-to-haiti-cuba-bahamas> [https://perma.cc/5JQU-6V98]. U.S. expulsions of Haitians were controversial. See Kristen E. Eichensehr, Contemporary Practice of the United States, 116 AJIL 164, 199–201 (2022). A parole process has now been created that admits a limited number of Haitians per month. See Implementation of a Parole Process for Haitians, 88 Fed. Reg. 1243 (Jan. 9, 2023).

Haiti has no elected president.²⁶ Prime Minister Henry is viewed as illegitimate due to the circumstances of his appointment.²⁷ There is no National Assembly, as regular elections have not taken place and the terms of its members have expired.²⁸ Public corruption at all levels, including in the judiciary, is rampant.²⁹ Most of the capital city of Port-au-Prince is controlled by gangs, as are other cities.³⁰ Unable to act, the government has told the Haitian people that their safety is in their own hands.³¹

The humanitarian crisis and the breakdown of public authority became so severe that, on October 6, 2022, the government, in a written resolution, asked that “a specialized armed force” from outside the country intervene.³² “We are not requesting for an occupying force,” said Bocchit Edmond, Haiti’s ambassador to the United States.³³ “We’re just requesting national assistance as a member of the international community who is facing such a tough time.”³⁴ Two days later, UN Secretary-General António Guterres proposed the deployment of “a rapid action force to support the Haitian National Police.”³⁵ The United States and Mexico, which was then a member of the Security Council, drafted two resolutions in response to the crisis. The first, adopted unanimously by the Council on October 21, established a sanctions regime targeting those that “threaten the peace, security or stability of Haiti,” including by “[e]ngaging in, directly or indirectly, or supporting criminal activities and violence involving armed groups and criminal networks that promote violence.”³⁶ The second, which has not been circulated, “would authorize a non-UN

²⁶ Luke Taylor, *Haiti Left with No Elected Government Officials as It Spirals Towards Anarchy*, GUARDIAN (Jan. 10 2023), at <https://www.theguardian.com/world/2023/jan/10/haiti-no-elected-officials-anarchy-failed-state>; Andre Paultre & Chris Cameron, *As Haiti’s Police Retreat, Gangs Take Over Much of the Capital*, N.Y. TIMES (Mar. 22, 2023), at <https://www.nytimes.com/2023/03/22/world/americas/haiti-police-gang-violence.html>.

²⁷ See Paultre & Cameron, *supra* note 26; Bureau Intégré des Nations Unies en Haïti, Communiqué du Core Group (July 17, 2021), at <https://binuh.unmissions.org/fr/communiqu%C3%A9-du-core-group-4> [<https://perma.cc/Q666-ZDT7>].

²⁸ See Paultre & Cameron, *supra* note 26.

²⁹ See *id.*; Jacqueline Charles, *Reports Detail How Haiti’s Public Administration Is a Cesspool of Corruption*, MIAMI HERALD (Aug. 27, 2022), at <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article264971389.html>.

³⁰ See Paultre & Cameron, *supra* note 26.

³¹ See *id.*

³² Widlore Mérancourt & Maïte Fernández Simon, *Haiti to Seek Foreign Military Intervention Amid Crises, Officials Say*, WASH. POST (Oct. 7, 2022), at <https://www.washingtonpost.com/world/2022/10/07/haiti-military-assistance-us-un-crisis/>.

³³ *Id.*

³⁴ *Id.*

³⁵ Letter Dated 8 October 2022 from the Secretary-General Addressed to the President of the Security Council, UN Doc. S/2022/747 (Oct. 20, 2022).

³⁶ SC Res. 2653, paras. 15, 16(a) (2022). The United States has sanctioned five individuals since November 2022, including the then-president of Haiti’s Senate, a former president of the Senate, and a former president of Haiti’s Chamber of Deputies. See U.S. Dep’t of the Treasury Press Release, Treasury Sanctions Former President of Haiti’s Chamber of Deputies (Apr. 5, 2023), at <https://home.treasury.gov/news/press-releases/jy1389> [<https://perma.cc/5YNU-BW5H>]; U.S. Dep’t of the Treasury Press Release, U.S. Sanctions Additional Corrupt Haitian Politicians for Drug Trafficking (Dec. 2, 2022), at <https://home.treasury.gov/news/press-releases/jy1137> [<https://perma.cc/9W3M-5V59>]; U.S. Dep’t of the Treasury Press Release, Treasury Sanctions Corrupt Haitian Politicians for Narcotics Trafficking (Nov. 4, 2022), at <https://home.treasury.gov/news/press-releases/jy1080> [<https://perma.cc/UU5Y-VDCC>]. Canada has imposed sanctions on twenty-one persons through June 2023, including two former Haitian presidents and two former prime ministers. See Global Affairs Canada, Sanctions: Grave Breach of International Peace and Security in Haiti, at <https://www.international.gc.ca/campaign-campagne/haiti-sanction/index.aspx?lang=eng> [<https://perma.cc/ES4B-R3SL>]; Dylan Robertson, *Ottawa Boosts Haiti Sanctions, Police Funding During Summit Aimed at Resolving Crisis*, NAT’L POST (June 15,

international security assistance mission [under Chapter VII of the UN Charter] to help improve the security situation and enable the flow of desperately needed humanitarian aid.”³⁷ Brian A. Nichols, Assistant Secretary of State for Western Hemisphere Affairs, indicated that the multilateral force “would be largely a police force with a military component.”³⁸ On December 14, State Department Principal Deputy Spokesperson Vedant Patel said that “there is a broad international consensus regarding the need to promote improved security conditions in Haiti” and “negotiations continue with partners and other [Security] [C]ouncil members to set defined and specific parameters for a mission and find the most effective means to support, enable, and resource it.”³⁹ The United States does not want to deploy its own troops, and other countries, including Brazil and Canada, are also reluctant to do so given the operational challenges and the lack of consensus on a political transition.⁴⁰ In April 2023, the Secretary-General “reiterate[d] the urgent need for the deployment of an international specialized armed force.”⁴¹ As of June, the United States was still pushing for a multinational force that would provide “‘near-term support’ for the Haitian National Police by securing ‘a limited number of critical infrastructure sites in Port-au-Prince, such as the airport and ports,’ relieving the burden on the local police to focus resources on its battle with gangs.”⁴²

The United States Promotes Individual Criminal Accountability for Aggression and Atrocity Crimes Committed by Russians in Ukraine

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“Justice and accountability are central pillars of the United States’ policy on Ukraine,” the White House stated in February 2023 marking the one-year anniversary of the Russian invasion.¹ Indeed, the United States has backed a wide range of international and domestic mechanisms, seeking to leverage their different expertise, capabilities, and authorities, to investigate and prosecute Russians for war crimes, crimes against humanity, and the crime of aggression, all of which the Biden administration has explicitly accused Russia of

2023), at <https://nationalpost.com/pmnn/news-pmnn/canada-news-pmnn/ottawa-boosts-haiti-sanctions-police-funding-during-summit-aimed-at-resolving-crisis>.

³⁷ U.S. Mission to the United Nations Press Release, Remarks by Ambassador Linda Thomas-Greenfield at a UN Security Council Briefing on Haiti (Oct. 17, 2022), at <https://usun.usmission.gov/remarks-by-ambassador-linda-thomas-greenfield-at-a-un-security-council-briefing-on-haiti-4> [<https://perma.cc/89XK-XEUK>].

³⁸ U.S. Dep’t of State Press Release, The Secretary’s Upcoming Travel to Canada (Oct. 26, 2022), at <https://www.state.gov/the-secretarys-upcoming-travel-to-canada>.

³⁹ U.S. Dep’t of State Press Release, Department Press Briefing (Dec. 14, 2022), at <https://www.state.gov/briefings/departement-press-briefing-december-14-2022> [<https://perma.cc/2NWL-ZMBY>].

⁴⁰ See Ian Austen, *American Hopes for Canadian Military Leadership in Haiti Likely to Be Dashed*, N.Y. TIMES (Mar. 23, 2023), at <https://www.nytimes.com/2023/03/23/world/americas/haiti-canada-us.html>; Natalie Kitroeff, *As Haiti Unravels, U.S. Officials Push to Send in an Armed Foreign Force*, N.Y. TIMES (Nov. 29, 2022), at <https://www.nytimes.com/2022/11/29/world/americas/haiti-gangs-foreign-intervention.html>.

⁴¹ United Nations Integrated Office in Haiti: Report of the Secretary-General, para. 72, UN Doc. S/2023/274 (Apr. 14, 2023).

⁴² See Michael Wilner & Jacqueline Charles, *Kamala Harris Will Push for a Multinational Force in Haiti During Visit to Caribbean*, MIAMI HERALD (June 8, 2023), at <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article276203876.html>.

¹ White House Press Release, Fact Sheet: One Year of Supporting Ukraine (Feb. 21, 2023), at <https://www.whitehouse.gov/briefing-room/statements-releases/2023/02/21/fact-sheet-one-year-of-supporting-ukraine> [<https://perma.cc/PHX5-G2B8>] [hereinafter One Year of Supporting Ukraine].