

# **Status of Human Rights in Colombia for the 44<sup>th</sup> Session of the Universal Periodic Review**

## **Introduction**

1. The European Centre for Law and Justice (ECLJ) is an international, non-governmental organization dedicated to promoting and protecting human rights around the world. The ECLJ also holds Special Consultative status before the United Nations Economic and Social Council. The purpose of this report is to raise concerns regarding human rights violations in the Republic of Colombia for the 44th Session of the Universal Periodic Review (UPR).

## **Background**

2. Colombia is a country in South America and has an estimated population of 49 million people.<sup>1</sup> The country is predominantly Christian, with approximately 92.3% of the population identifying as Roman Catholic, 1% as other, and 6.7% as unspecified.<sup>2</sup> However, despite the country being predominately Christian, in its 2023 World Watch List, Open Doors listed Colombia as the 22nd worst place for Christians to live.<sup>3</sup> This stems from the fact that “guerrilla groups and gangs still control and fight over large parts of the national territory. . . . They see the church as a threat to their power and stability, particularly when gang members become Christians or church leaders speak out against violence and corruption.”<sup>4</sup>

3. Colombia’s previous UPR was held on May 10, 2018.<sup>5</sup> As a result of the review, Colombia received 211 recommendations, 183 of which it accepted.<sup>6</sup> Even though there are reports of violence being carried out against Christians by cartels and guerilla groups, there were no recommendations made regarding religious persecution.<sup>7</sup> On the issue of abortion, it was recommended by Denmark, and supported by Colombia, that the government “[g]uarantee full access to safe abortion, within the existing legal framework, in all regions of the country.”<sup>8</sup> Additionally, it was recommended by the Maldives, and supported by Colombia, that the government “[c]ontinue efforts to enhance international, regional and bilateral cooperation with countries of origin, transit and destination to prevent trafficking in persons through information exchange aimed at prosecuting traffickers.”<sup>9</sup>

## **Legal Framework**

### *Religious Violence*

4. Under Article 11 of the Constitution of Colombia, “[t]he right to life is inviolate.”<sup>10</sup> Further, under Article 19, “[f]reedom of religion is guaranteed. Every individual has the right to freely profess his/her religion and to disseminate it individually or collectively.”<sup>11</sup>

5. Additionally, Colombia is a party to the International Covenant on Civil and Political Rights (ICCPR) and therefore has a responsibility to uphold protections for religious liberty.<sup>12</sup> Under Article 18 of the ICCPR:

1. Everyone shall have the right to freedom of thought, conscience and religion. This right shall include freedom to have or to adopt a religion or belief of his choice, and freedom, either individually or in community with

others and in public or private, to manifest his religion or belief in worship, observance, practice and teaching.

2. No one shall be subject to coercion which would impair his freedom to have or to adopt a religion or belief of his choice.<sup>13</sup>

### Abortion

6. Colombia's constitution protects the right to life. Again, Article 11 states, "[t]he right to life is inviolate."<sup>14</sup>

7. However, despite the protection of life enshrined in the Constitution, on February 21, 2022, "Colombia's Constitutional Court legalized abortion during the first 24 weeks of pregnancy."<sup>15</sup>

8. Further, under Article 6 of the ICCPR, "[e]very human being has the inherent right to life. This right shall be protected by law. No one shall be arbitrarily deprived of his life."<sup>16</sup> Colombia also has a responsibility to uphold pro-life principles enshrined in other international agreements such as the UN Charter, Universal Declaration of Human Rights (UDHR), and the 1994 Cairo Conference on Population and Development.

### *Human Trafficking*

9. Colombia's constitution protects against modern slavery. Article 17 of Colombia's Constitution provides that "[s]lavery, servitude, and the slave trade in all forms are prohibited."<sup>17</sup>

10. Under Article 188 A of Colombia's penal code:

[...] Anyone who detains, transports, harbours or receives a person within the national territory or abroad for the purpose of exploitation shall be liable to a term of imprisonment of thirteen (13) to twenty-three (23) years and a fine of eight hundred (800) to one thousand, five hundred (1,500) times the current minimum statutory monthly wage.<sup>18</sup>

11. Moreover, the ICCPR holds that "[n]o one shall be held in slavery; slavery and the slave-trade in all their forms shall be prohibited. No one shall be held in servitude."<sup>19</sup>

12. Colombia is also a party to the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime.<sup>20</sup> Under Article 9 sec. 1 of this Protocol:

States Parties shall establish comprehensive policies, programmes and other measures:

- (a) To prevent and combat trafficking in persons; and
- (b) To protect victims of trafficking in persons, especially women and children, from revictimization.<sup>21</sup>

### **Religious Violence**

13. Despite the population of Colombia being predominantly Christian, Christians are targeted by guerrilla groups and armed gangs. Cartels view Christians as a threat because “[t]hey don’t want Christians helping people overcome drug addiction or trying to stop young people from being lured into the ranks of the rebels.”<sup>22</sup>

14. In 2022, Twenty-one Christians were killed in Colombia for their faith.<sup>23</sup> Also, “churches and other Christian buildings” were attacked thirty-seven times.<sup>24</sup>

15. On March 31, 2022, armed gunmen shot and killed three people, two of whom were Christian pastors.<sup>25</sup> According to a report, armed gunmen arrived on motorcycles and shot the three people point blank.<sup>26</sup>

16. In 2020, “paramilitary groups closed about sixty churches in the North of Colombia, specifically in Antioquia, Bolívar, Choco and Córdoba.”<sup>27</sup>

[C]hurches and pastors’ homes were marked with the initials of the paramilitary group Autodefensas Gaitanistas de Colombia (AGC); [t]hey were not allowed to hold worship services or visit the faithful in their homes. These threats are part of the strategies of these groups to reinforce their control in the areas.<sup>28</sup>

17. In August 2019, a Colombian pastor was shot and killed while he was at home.<sup>29</sup> Pastor Salcedo was “shot multiple times in his home.”<sup>30</sup> While the exact motivation is unknown, it is believed to have been in response to a protest a few days earlier calling for peace in the region. In order to gain control, “[i]llegal armed groups often attempt to force the cooperation of church leaders in an effort to bring the entire community under their authority.”<sup>31</sup>

18. In 2019 alone, “Christians in Buenaventura, Colombia have seen eight violent attacks against Christians, two churches shattered, one murder and multiple cases of threats, extortion and abuse.”<sup>32</sup> And on February 9, 2019, a Christian pastor was shot five times when he stepped outside after he finished conducting a church service.<sup>33</sup>

19. Indigenous groups also threaten and target “Christians who do not follow their brand of indigenous faith.”<sup>34</sup> For example, a Colombian teenager “was moved to a safe house by a Christian ministry after experiencing persecution at the hands of a local indigenous people group.”<sup>35</sup> She was sent away after she was denied an exemption from “non-Christian instruction” and was even prevented from changing schools.<sup>36</sup> After the exemption was denied, her family received “horrific threats” by local guerrilla groups.<sup>37</sup> Even though the girl is now safe, she still worries about her family.<sup>38</sup> As she stated, “[s]ometimes, I’m afraid, and I tell my mother: ‘Don’t leave my sister alone’ . . . . We’ve had various threats against members of my family, and one of those is with my sister. I would be afraid that all of a sudden she would . . . be abused because that’s one of the threats we’ve received.”<sup>39</sup>

## **Abortion**

20. Before 2022, abortion was only permitted “in cases of rape, fetal malformation and when the woman’s health [was] in danger.”<sup>40</sup> On February 21, 2022, Colombia’s Constitutional Court adopted the extreme position of legalizing abortion through twenty-four weeks of pregnancy,<sup>41</sup> well past the age where a preborn baby can survive outside of the womb.

21. For decades Colombia has recognized the inherent value of human life, a position that is in line with numerous international documents and agreements. Now, Colombia's position is in direct contravention to those same documents. For example, since the 1994 Cairo Conference on Population and Development, U.N. Member States have had an affirmative commitment to "reduce the recourse to abortion" and to "take appropriate steps to help women avoid abortion, *which in no case should be promoted as a method of family planning.*"<sup>42</sup> Additionally, the UDHR requires "recognition of the inherent dignity and of the equal and inalienable rights of *all* members of the human family [as] the foundation of freedom, justice and peace in the world," and provides that "[e]veryone has the right to life . . ."<sup>43</sup> Article 6 of the ICCPR likewise states that "[e]very human being has the inherent right to life. This right shall be protected by law."<sup>44</sup> And the preamble to the U.N. Charter states that "the peoples of the United Nations determined . . . to reaffirm faith in fundamental human rights, in the dignity and worth of the human person . . ."<sup>45</sup> Clearly, these important and fundamental instruments require protection of human life and none of them contain a "right to an abortion."

22. Colombia's new position on abortion is even an extreme position among U.N. Member States. As we established above, there is no international right to abortion and this fact can be practically seen when looking at different countries' abortion laws. Currently, out of the 193 U.N. Member States, an overwhelming majority (109) of them have strict limits on abortion.<sup>46</sup> Even in the sixty-seven countries that have varying gestational limits for on demand abortions, the majority of these (fifty-two) have a gestational limit of twelve weeks or less.<sup>47</sup> To further demonstrate how extreme Colombia's new law on abortion is, Colombia is one of only nine countries that permit abortion at twenty-one weeks or beyond.<sup>48</sup>

23. Colombia's efforts to expand access to abortion can also result in physical and psychological harm to women who undergo the procedure. It has been well-documented that abortion can result in the perforation of the uterus or the laceration of the cervix.<sup>49</sup> Furthermore, abortion deprives women of the health benefits that come from continuing pregnancy, such as the elimination of the protective effect a full-term pregnancy has against breast cancer.<sup>50</sup> Abortion can also mask other dangerous symptoms, like an undiagnosed ectopic pregnancy.<sup>51</sup> In fact, in its 2022 "Abortion care guideline," the World Health Organization even acknowledged the complications of abortion.<sup>52</sup>

24. Furthermore, women who have undergone abortions have also been reported to experience negative psychological side effects, from shame to drug abuse to suicidal thoughts.<sup>53</sup> All of these reasons show why Colombia must protect both women and preborn children from the devastating effects of abortion.

25. Contrary to the Colombian Constitutional Court's opinion, many Colombians recognize the harm that abortion causes and understand the obligation to protect life. Just a few days after abortion was expanded, "approximately 500,000 people gathered across 70 cities in Colombia to march for life, a form of protest to reject the [] decision by the Constitutional Court . . ."<sup>54</sup>

## **Human Trafficking**

26. In Colombia, "sex trafficking takes place both in-person — in places such as brothels, hotels, and private homes — and online."<sup>55</sup> Traffickers have been known to, in some cases, to "drug victims and/or use debt- and extortion-based coercion to force victims to perform live sexual acts."<sup>56</sup> The vast majority of these victims are women. In 2019, 109 out 124 identified victims were women.<sup>57</sup>

27. Displaced Venezuelans are particularly vulnerable to human trafficking in Colombia.<sup>58</sup> This is largely due to the economic collapse and political instability in Venezuela which has led to millions of Venezuelans fleeing the country.<sup>59</sup> Traffickers exploit this vulnerability and recruit women “on the Colombian-Venezuelan border for sexual exploitation . . . .”<sup>60</sup>

28. In 2022, Colombia partnered with the United States’ Homeland Security Investigations (HSI).<sup>61</sup> As part of this partnership, HSI “worked with local law enforcement to arrest 42 alleged human smugglers . . . .”<sup>62</sup> This partnership has been very beneficial in the fight against human trafficking as Colombia can receive intel from U.S. agents and use that information to arrest human traffickers.<sup>63</sup>

29. On August 6, 2021, police in Colombia arrested six individuals “believed to be behind the trafficking and sexual exploitation of Colombian and Venezuelan women.”<sup>64</sup> These arrests came after a three-year-long investigation that was conducted “following the discovery of several victims who had been promised jobs as waitresses, only to have their passports confiscated and be exploited. They were often denied food, slept on the floor and would regularly see their so-called ‘debts’ for ‘travel and accommodation’ increase arbitrarily.”<sup>65</sup>

30. On March 27, 2021, Colombian authorities arrested an organized criminal group called Grupo de Delincuencia Organizado (GDO).<sup>66</sup> This organization created a passageway for undocumented Venezuelans to come to Colombia.<sup>67</sup> Colombia’s Attorney General’s Office found that

when the women arrived in Colombia, [GDO] offered them a place to stay, food and clothing, but [GDO] then forced [the women] to participate in prostitution until they could pay the debt they acquired for the papers to cross the border and their room and board. If the women refused, they threatened to deport them or post naked photos of them on social media.<sup>68</sup>

This is a common pattern in many human trafficking cases. Traffickers lure migrants with promises of jobs and housing in Colombia and, once they are able to get the women to Colombia, they force the women into sexual exploitation, threatening the women if they do not comply.<sup>69</sup>

31. In 2020, Colombian police arrested and charged seven traffickers with “luring and sexually exploiting at least 30 Colombian women and migrants who were sent to work in nightclubs in the Chinese city of Guangdong.”<sup>70</sup> According to a report, “[t]he traffickers imposed debts on them of \$14,000, which they were forced to pay off by making \$600 a day in sex work.”<sup>71</sup>

32. Children are also vulnerable to human trafficking. In Colombia, child trafficking accounts for 12% of trafficking victims.<sup>72</sup> Colombia attempted to address this issue in 2018 when it strengthened penalties for crimes of commercial sexual exploitation and established protective provisions that safeguarded children on the internet.<sup>73</sup> Unfortunately, these laws and programs were not helpful because they were not enforced. “Danitza Marentes, Valientes’, the director of ESCNNA Observation (Commercial Sexual Exploitation of Boys, Girls, and Adolescents) explain[ed] that the institutional and judicial weaknesses in Colombia result in a child trafficking impunity rate of a staggering 90%.”<sup>74</sup> Furthermore, “[a]ccording

to the state prosecutor Mario Gómez Jiménez, out of 85,000 investigations into claims of child sex abuse between 2005 and 2018, only 6,116 ended in a conviction.”<sup>75</sup>

33. In June 2022, police dismantled a child sex trafficking ring in the city of Cúcuta located along the border with Venezuela.<sup>76</sup> Police found “five girls, aged 12 to 15, in a room for rent on the second floor of a bar in Cúcuta . . . . The girls, some of whom were identified as Venezuelan migrants, had been deprived of their identification papers.”<sup>77</sup>

34. In February 2019, Colombian authorities arrested three individuals for running a human trafficking ring “that was dedicated to the sexual exploitation of girls and adolescents between Colombia, Brazil and Peru.”<sup>78</sup> However, these arrests resulted in no convictions.<sup>79</sup>

## Recommendations

35. Colombia must take action against cartels and guerilla groups to stop the violence being carried out against Christians across Colombia, as well as the Christian persecution by indigenous groups.

36. We also ask that Colombia take efforts to protect life at all stages. Such reformation of these laws by Colombia is a position supported not only by its own Constitution, but is one that is also held by the most widely accepted human rights treaties, as well as Colombia’s own people. Colombia would not be alone in taking this humane step, as countless other countries make it a priority to protect the lives of preborn babies.

37. Further, Colombia must enforce its laws on human trafficking. Because many victims of human trafficking originate from Venezuela, efforts must be taken to educate vulnerable individuals of the dangers of human trafficking. Additionally, training must be provided to police so that they can identify victims of human trafficking and arrest the perpetrators. Further, Colombia must commit to holding the perpetrators accountable for their crimes. This can be done by strengthening the judicial system so that it is properly equipped to punish the perpetrators.

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<sup>1</sup> *Colombia*, THE WORLD FACTBOOK, <https://www.cia.gov/the-world-factbook/countries/colombia/> (Feb. 10, 2023).

<sup>2</sup> *Id.*

<sup>3</sup> *Colombia*, OPEN DOORS US, <https://www.opendoorsus.org/en-US/persecution/countries/colombia/> (last visited Feb. 27, 2023).

<sup>4</sup> *Id.*

<sup>5</sup> *Universal Periodic Review – Colombia*, OHCHR, <https://www.ohchr.org/en/hr-bodies/upr/co-index> (last visited Feb. 27, 2023).

<sup>6</sup> *Colombia Infographic 30th*, OHCHR, [https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session30/CO/COLOMBIA\\_Infographic\\_30th.pdf](https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session30/CO/COLOMBIA_Infographic_30th.pdf) (last visited Feb. 27, 2023).

<sup>7</sup> *Colombia*, *supra* note 3.

<sup>8</sup> OHCHR, UPR of Columbia (3rd Cycle - 30th Session): Thematic List of Recommendations, <https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session30/CO/MatriceRecommendationsColombia.docx> (last visited Feb. 27, 2023).

<sup>9</sup> *Id.*

<sup>10</sup> CONSTITUCIÓN POLÍTICA DE COLOMBIA [C.P.] art. 11, [https://www.constituteproject.org/constitution/Colombia\\_2015.pdf?lang=en](https://www.constituteproject.org/constitution/Colombia_2015.pdf?lang=en).

<sup>11</sup> *Id.* art. 19.

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<sup>12</sup> *Ratification Status for Colombia*, OHCHR,

[https://tbinternet.ohchr.org/\\_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=37&Lang=EN](https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=37&Lang=EN) (last visited Feb. 27, 2023).

<sup>13</sup> International Covenant on Civil and Political Rights art. 18, Dec. 16, 1966, 999 U.N.T.S. 171, <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights> [hereinafter ICCPR].

<sup>14</sup> C.P., *supra* note 10, art. 11.

<sup>15</sup> John Otis, *Abortion Laws in Colombia Are Now Among the Most Liberal in the Americas*, NPR, <https://www.npr.org/sections/goatsandsoda/2022/05/10/1097570784/colombia-legalized-abortion-for-the-first-24-weeks-of-pregnancy-a-backlash-ensu> (July 13, 2022, 2:52 PM).

<sup>16</sup> ICCPR art. 6, *supra* note 13.

<sup>17</sup> C.P., *supra* note 10, art. 17.

<sup>18</sup> Memorandum on the Legal Considerations Concerning the Scope and Application of the Principle of Universal Jurisdiction art. 188 A (Apr. 11, 2011), [https://www.un.org/en/ga/sixth/66/ScopeAppUniJuri\\_StatesComments/Colombia%20\(S%20to%20E\).pdf](https://www.un.org/en/ga/sixth/66/ScopeAppUniJuri_StatesComments/Colombia%20(S%20to%20E).pdf).

<sup>19</sup> ICCPR art. 8, *supra* note 13.

<sup>20</sup> *A Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organized Crime*, UNITED NATIONS TREATY COLLECTION, [https://treaties.un.org/pages/viewdetails.aspx?src=ind&mtdsg\\_no=xviii-12-a&chapter=18](https://treaties.un.org/pages/viewdetails.aspx?src=ind&mtdsg_no=xviii-12-a&chapter=18) (Feb. 27, 2023, 10:15 AM).

<sup>21</sup> Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organized Crime art. 9, § 1, *adopted* Nov. 15, 2000, 2237 U.N.T.S. 319, [https://treaties.un.org/doc/Treaties/2000/11/20001115%2011-38%20AM/Ch\\_XVIII\\_12\\_ap.pdf](https://treaties.un.org/doc/Treaties/2000/11/20001115%2011-38%20AM/Ch_XVIII_12_ap.pdf).

<sup>22</sup> Open Doors UK, *The Heavy Price Paid by Christians Who Stand up to Colombia's Powerful Drug Cartels*, Christian Today (Dec. 4, 2020, 3:37 PM).

<sup>23</sup> *The 50 Countries Where It's Hardest to Follow Jesus in 2023*, CHRISTIANITY TODAY (Jan. 17, 2023, 06:01 PM), <https://www.christianitytoday.com/news/2023/january/christian-persecution-2023-countries-open-doors-watch-list.html>.

<sup>24</sup> *Id.*

<sup>25</sup> *The Scourge Continues: Colombia Ends the Week with a Figure of Two Massacres*, INFOBAE (Apr. 2, 2022), <https://www.infobae.com/en/2022/04/02/the-scurge-continues-colombia-ends-the-week-with-a-figure-of-two-massacres/>.

<sup>26</sup> *Id.*

<sup>27</sup> *Paramilitary Groups Close Churches in Northern Colombia*, OBSERVATORY OF RELIGIOUS FREEDOM IN LATIN AMERICA (Nov. 20, 2020), <https://olire.org/paramilitary-groups-close-churches-in-northern-colombia/>.

<sup>28</sup> *Id.*

<sup>29</sup> *Pastor Shot Dead in His Home in Taraza*, CSW (Aug. 12, 2019), <https://www.csw.org.uk/2019/08/12/press/4429/article.htm>.

<sup>30</sup> *Id.*

<sup>31</sup> *Id.*

<sup>32</sup> *Christians Denounce Persecution in Colombia*, EVANGELICAL FOCUS (Aug. 1, 2019, 5:20 PM), <https://evangelicalfocus.com/world/4642/Christians-denounce-persecution-in-Colombia>.

<sup>33</sup> *Another Colombian Pastor Killed, Leaving the Church "Terrified"*, WORLD WATCH MONITOR (Feb. 14, 2019), <https://www.worldwatchmonitor.org/2019/02/another-colombian-pastor-killed-leaving-the-church-terrified/>.

<sup>34</sup> Anugrah Kumar, *Christian Teen Fled Persecution in Colombia, Fears for Family's Safety Amid Threats of Violence*, CHRISTIAN POST (Dec. 15, 2022).

<sup>35</sup> *Id.*

<sup>36</sup> *Id.*

<sup>37</sup> *Id.*

<sup>38</sup> *Id.*

<sup>39</sup> *Id.*

<sup>40</sup> Otis, *supra* note 15.

<sup>41</sup> Ximena Casas, *Landmark Decision on Colombia Abortion Rights*, HUMAN RIGHTS WATCH (Feb. 22, 2022), <https://www.hrw.org/news/2022/02/22/landmark-decision-colombia-abortion-rights>.

<sup>42</sup> *Report of the International Conference on Population and Development*, U.N. Doc. A/CONF/F.171/13/Rev.1 at 58 (5-13 Sept. 1994),

<sup>43</sup> G.A. Res. 217 (III) A, Universal Declaration of Human Rights, pmbl., art. 3 (Dec. 10, 1948) (emphasis added).

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<sup>44</sup> ICCPR art. 6, *supra* note 13.

<sup>45</sup> U.N. Charter pmb1.

<sup>46</sup> *The World's Abortion Laws*, CTR. FOR REPROD. RTS. (Sep. 27, 2022), [https://reproductiverights.org/wp-content/uploads/2022/09/WALM\\_20220927\\_V1.pdf](https://reproductiverights.org/wp-content/uploads/2022/09/WALM_20220927_V1.pdf).

<sup>47</sup> *Id.*

<sup>48</sup> *Id.*

<sup>49</sup> *Women's Right to Know: Abortion & Pregnancy Risks*, LA. DEP'T OF HEALTH, <https://ldh.la.gov/page/915> (last visited Nov 19, 2022).

<sup>50</sup> See Justin D. Heminger, *Big Abortion: What the Antiabortion Movement Can Learn from Big Tobacco*, 54 CATH. U.L. REV. 1273, 1288-89, 1290 n.119 (2005).

<sup>51</sup> See generally *Physical Effects of Abortion: Fact Sheets, News, Articles, Links to Published Studies and More*, THE UNCHOICE, [www.theunchoice.com/physical.htm](http://www.theunchoice.com/physical.htm) (last visited Feb. 22, 2023) (listing sequelae and referencing sources).

<sup>52</sup> *Abortion Care Guideline*, WORLD HEALTH ORGANIZATION & HUMAN REPRODUCTION PROGRAMME 79 (Mar. 8, 2022), <https://www.who.int/publications/i/item/9789240039483>.

<sup>53</sup> Priscilla K. Coleman et al., *Women Who Suffered Emotionally from Abortion: A Qualitative Synthesis of Their Experiences*, 22 J. AM. PHYSICIANS & SURGEONS 113, 116-17 (2017), <https://www.jpands.org/vol22no4/coleman.pdf>.

<sup>54</sup> *Hundreds of Thousands March for Life in Colombia to Protest Decriminalisation of Abortion*, THE LIFE INSTITUTE (Mar. 16, 2022), <https://thelifeinstitute.net/news/2022/hundreds-of-thousands-march-for-life-in-colombia-to-protest-decriminalisation-of-abortion>.

<sup>55</sup> *The Anti-Hum. Trafficking in Colom., Human Trafficking in Colombia*, THE EXODUS ROAD (Sep. 22, 2021), <https://theexodusroad.com/human-trafficking-in-colombia/>.

<sup>56</sup> *Id.*

<sup>57</sup> *Id.*

<sup>58</sup> *Id.*

<sup>59</sup> *Id.*

<sup>60</sup> *Colombian Criminal Groups Linked to Trafficking of Venezuelans*, DIÁLOGO AMÉRICAS (Sep. 2, 2022), <https://dialogo-americas.com/articles/colombian-criminal-groups-linked-to-trafficking-of-venezuelans/#.Y3z7AC-B1hE>.

<sup>61</sup> Julia Ainsley, *Inside a U.S. and Colombian Operation to Bust Human Traffickers*, NBC NEWS (Nov. 26, 2022, 8:00 AM), <https://www.nbcnews.com/politics/immigration/us-colombian-operation-bust-human-traffickers-rcna58521>.

<sup>62</sup> *Id.*

<sup>63</sup> *Id.*

<sup>64</sup> *Colombian Police Take Down Criminal Group Behind Human Trafficking*, INTERPOL (Aug. 23, 2021), <https://www.interpol.int/en/News-and-Events/News/2021/Colombian-police-take-down-criminal-group-behind-human-trafficking>.

<sup>65</sup> *Id.*

<sup>66</sup> Laura Ávila, *Dismantled Network Illustrates Pattern in the Exploitation of Venezuelan Migrants in Colombia*, INSIGHT CRIME (Apr. 5, 2021), <https://insightcrime.org/news/dismantled-network-illustrates-pattern-exploitation-venezuelan-migrants-colombia/>.

<sup>67</sup> *Id.*

<sup>68</sup> *Id.*

<sup>69</sup> *Id.*

<sup>70</sup> Anastasia Moloney, *Colombia Makes Arrests in Sex Trafficking Plot That Lured Women to China*, REUTERS (Sept. 8, 2020, 5:55 PM), <https://www.reuters.com/article/us-colombia-trafficking-arrests-trfn/colombia-makes-arrests-in-sex-trafficking-plot-that-lured-women-to-china-idUSKBN25Z39A>.

<sup>71</sup> *Id.*

<sup>72</sup> Tereza Bizkova, *A Look Into Child Trafficking in Colombia*, THE BOGOTA POST (Sep. 27, 2021), <https://thebogotapost.com/a-look-into-child-trafficking-in-colombia/49278/>.

<sup>73</sup> *Id.*

<sup>74</sup> *Id.*

<sup>75</sup> *Id.*

<sup>76</sup> Gabrielle Gorder, *Politicians and Police Linked to Colombian Child Sex Ring*, INSIGHT CRIME (Jul. 1, 2022), <https://insightcrime.org/news/politicians-and-police-linked-to-colombian-child-sex-ring/>.

<sup>77</sup> *Id.*

<sup>78</sup> Boris Miranda, *The “Madame del Amazonas” Gang Falls, the Sexual Exploitation Network that Trafficked Minors in Colombia, Brazil and Peru*, BBC NEWS (Feb. 15, 2019), <https://www.bbc.com/mundo/noticias-america-latina-47248663>,

<sup>79</sup> Bizkova, *supra* note 72.