



RESEARCH SERIES: USE AND ABUSE OF EXTRADITION IN THE WAR ON DRUGS*

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Extradition in Mexico and Venezuela: Going in Opposite Directions

Executive Summary:

In 2007, the Mexican government extradited Osiel Cárdenas, the feared head of the Gulf Cartel. The impact was immediate. Smaller and larger cartels sought to take advantage of the presumed power vacuum and entered in force. The Mexican army has had to assist in policing the area, leading to widespread accusations of abuses and political fallout. The Mexican government has also had to scramble to shore up support for its efforts to crackdown on the cartels.

Still, the ripples that went through underworld following the extradition may have served a larger purpose: send a message that accountability is now a transnational predicament for the traffickers. The extradition was part of a Mexican Government policy to break down the increasingly powerful drug cartels using a wide variety of tools. These include greater military and police presence in the streets, more arrests, and searches and seizures. They also include changes in the judicial structures and legal codes, and new interpretations of old laws that govern the extradition of nationals.

However, while Mexico appears more open to extraditing suspected criminals, Venezuela has hardened its stance with regards to extradition. Just a few months before Mexico extradited Cárdenas, Venezuela's Supreme Court decided not to extradite Juan Mateo Holguín Ovalle, a Dominican national facing charges of drug trafficking in the United States. The decision, the court said, came because the United States refused to insure that Holguín Ovalle would not face more than 30 years in jail, the maximum penalty in Venezuela. US authorities, however, interpreted the Court's ruling in a political manner, and pointed out that since President Hugo Chávez took power in 1999, no accused trafficker or otherwise has been extradited to the US.¹

To be sure, while Mexico this year extradited a record number of people to the United States, Venezuela has halted extraditions to the US, and has only sporadically extradited suspects to other countries. The difference, it appears, is politics. Mexico's relationship with the United States has rarely been better. The two countries are increasingly cooperating on law enforcement, trade, cultural and military matters. They also seem to be of one mind when it comes to the drug trafficking scourge, leading to the increased number of extraditions from both sides of the border. This has led to mixed results in the field, but better relations between the governments.

For its part, under President Hugo Chávez, Venezuela has turned away from the US, seeking to create a new coalition in the region that depends less on the North American economic, political and judicial support. The results, so far, have been mixed as well, with traffickers seeking a safe haven in Venezuela, with little fear of being extradited to face criminal charges in the United States. The US government has done its part to fracture this relationship by refusing to extradite a prominent Cuban-Venezuelan citizen who is implicated in the bombing of a Cubana airliner in 1976.

For the last several months, we, at the Fundación Ideas para la Paz, a non-profit think tank based in Bogotá, have been focusing on Colombia's relationship with the United States vis-à-vis extradition and have found that politics is a central component in understanding the decisions regarding the use of this judicial tool. The cases of Mexico and Venezuela reaffirm that belief. What's more, they provide us with a better understanding of where the extradition process fails and how it might be better implemented.

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Context:

By a wide margin, Colombia extradites more suspected criminals than any other country in the world. On average Colombia sends close to 200 people to face trial in foreign countries per year, nearly all of those to the United States for drug trafficking charges. The extraditions have made Colombia a symbol of judicial cooperation in the United States and, in part, contribute to the country's status as the favorite destination for US aid in the hemisphere, receiving close to \$600 million per year. But the extraditions have also caused political tension, human suffering and may have helped thwart a peace and reconciliation process between the government and right-wing paramilitaries known as *Autodefensas Unidas de Colombia (AUC)*.

Colombia's Supreme Court, perhaps recognizing this, has rejected a number of US requests for extradition in recent months. The judges' arguments have centered on where the criminal acts occurred. They have provoked condemnation on the part of the Colombian executive branch and the US government. Following one decision that denied the request to extradite a guerrilla commander, the United States government sent a diplomatic note to Colombia, protesting the decision. Since then, there have been high level meetings to sort out the difficulties, but Colombia's Supreme Court has remained firm, even rejecting another request on the basis that it would violate a law established to facilitate a peace process with right-wing paramilitaries. This decision came just months after the court had approved the extradition of several paramilitary commanders to the US.

Given that most of the extraditions in the region are from Colombia to the United States, we at FIP have spent the last several months studying these cases. However, other countries in the region are also going through changes and facing challenges when it comes to their relationship with the US vis-à-vis extradition, most notably Mexico and Venezuela, and, as part of a year-long project on extradition, we wanted to look closer at those countries' processes and decisions as it relates to extradition.

Both Mexico and Venezuela have long-standing extradition treaties with the US, but the two seem to be moving in opposite directions when it comes to judicial cooperation with the United States. Mexico appears to be increasing its relationship with the US, while Venezuela has turned away from the United States in judicial and other matters. This trend extends to extraditions where Mexico has hit record levels of extraditions, and Venezuela has halted all extraditions to the US.

Part of this can be explained by simply looking at the politics in the region. Mexico's government has forged a closer partnership with the US in recent years, in part because of increasing violence at home. Venezuela's President Hugo Chávez has made little secret that he is against US policy in the region. Chávez has even declared the United States his number one enemy. Yet, there are other reasons for this shift that are less obvious. Exploring those gives us a chance to look at the different models of cooperation.

The question of extradition also helps us cut to the heart of the evolving relationship between these countries and the US.

Mexico-US History: A Volatile Relationship

Mexico and the United States have a long and volatile history. The two share a 2,000-mile border that is nearly impossible to police. Rebel forces, as well as indigenous and criminal organizations, have crossed the border on numerous occasions to attack, thief and plunder from the other side. In response, US armies, federal investigators, drug agents, tax collectors and other US officials have entered the country without permission to apprehend or pursue Mexican nationals for crimes committed in the United States or against US citizens. Their justification nearly always centers on the lawlessness and impunity that pervades in Mexico, and arguably still does today.

Cooperation in judicial matters has been equally difficult to manage in spite of numerous treaties and agreements that have been signed by the two nations over the years. Mexico's extradition treaty with the United States dates back to 1980, when the two countries "modernized" the old treaty (from 1899) to include ways to insure that all crimes punishable in both countries were extraditable offenses. Each nation also agreed to "provisional arrests" of suspects, while the extradition papers were prepared, as well as limitations for political or military crimes.²

Still, these changes did not facilitate many extraditions between the nations, particularly since Mexico did not extradite its citizens to the United States. While the extradition of Mexican nationals was not strictly prohibited, Mexican politicians and judges interpreted the law as such, claiming that Mexico should prosecute its own within its borders. Mexico, however, did not have a strong police and judicial system, and many crimes went unpunished. In certain cases, the lack of results on the part of the Mexican government infuriated the United States government and led to some drastic actions that greatly undermined the relationship between the countries.

In 1985, Enrique Camarena, an agent for the Drug Enforcement Administration (DEA), was kidnapped, tortured and killed by a Mexican drug ring that worked closely with Mexican police. The US indicted 22 individuals, but investigations into the case stalled in Mexico, and while arrests were made and prosecutions followed, no one was extradited. Frustrated, the DEA took action. In 1990, agents paid Mexican bounty hunters to kidnap one of the suspects, Humberto Alvarez Machaín, in clear violation of the countries' extradition treaty, and bring him to the United States to face charges. Alvarez Machaín was a doctor by profession. His role in the drug ring and the kidnapping and death of Camarena was far from clear, and in Mexico, he'd avoided prosecution.

Following his kidnapping, Mexican authorities sent three diplomatic notes demanding that US authorities to repatriate him, but the US refused.

The first trial did not proceed as prosecutors and DEA agents had hoped. In a stunning reversal, the Los Angeles District Court said it could not hear the case because the US had clearly violated the 1980 extradition treaty. Prosecutors appealed, but the California Appeals Court upheld the district court's decision. The case eventually made its way to the US Supreme Court where, in another stunning reversal, the court ruled in favor of a trial. "The Treaty says nothing about the obligations of the United States and Mexico to refrain from forcible abductions of people from the territory of the other nation, or the consequences under the Treaty if such an abduction occurs," the court said in one of the most criticized decisions in its history.³ Governments across the globe condemned the court's decision. Ironically, Alvarez Machaín was acquitted in the subsequent trial.

The DEA's kidnapping and the Supreme Court's decision to support it made judicial relations between the nations very difficult. In 1994, Mexico demanded and succeeded in getting the US to alter the extradition treaty to "prohibit cross-border kidnappings."⁴ Extraditions stopped until 1996, when Mexico extradited a singer convicted of child molestation. Several more extraditions occurred in the years that followed, including two high-level drug trafficking suspects. In 2001, relations improving, the countries signed a protocol authorizing extraditions even if a person was in the middle of serving his sentence.

The door completely opened following a Mexican Supreme Court decision in June 2006. Facing several appeals of extradition cases, the court declared that Article 10 of the extradition law, which, among other things, protects Mexican nationals from being extradited, was not applicable if there existed a treaty between the soliciting government and the Mexican government. The Court also said that if authorities from the soliciting government assured Mexican authorities that sentences that were not allowed in Mexico (e.g., the death penalty) would not be applied to the suspects if found guilty in the soliciting country, then this should not present an obstacle to extradition.⁵

Felipe Calderon's awareness of organized crime as a multinational problem accelerated this process. From the beginning of his term in 2006, Calderon fashioned a multipronged strategy to break Mexican drug cartels' growing power. On the military and police side, the Calderon administration vetted and trained more security personnel and authorized more direct action by the army in security matters. On the investigative side, the president trained more detectives and forensic teams. On the legal side, the administration updated the Mexican penal code to allow for more effective crime-fighting strategies such as the legal authority to wiretap and infiltrate these cartels, as well as the ability to extradite suspects and convicted traffickers to the United States.

The results are historic. Extraditions have increased every year, reaching 100 for the first time this year and nearing the 300 mark for the three years since Calderon's inauguration.⁶ The list includes some of the most sought after cartel leaders, such as Osiel Cárdenas, the former head of the Gulf Cartel, extradited in 2007. The extent to which the Mexican government seems prepared to cooperate with the US was particularly evident when it extradited Rafael Caro Quintero, a member of the drug ring that had kidnapped and killed Enrique Camarena in 1985.

The feeling appears to be mutual. During the same time period, the US has also increased the number of suspects it has extradited to Mexico. This includes several suspects that are wanted for drug trafficking crimes in Mexico. The extraditions illustrate both a greater willingness to cooperate on legal matters and an increased confidence the US has in Mexico's judicial and penal system.

The extraditions have also coincided with more law enforcement cooperation and more US aid to Mexico. In 2008, the US launched the Merida initiative, a \$1.4 billion effort to help Mexico's and Central America's security forces with upgrades in technology, training for police and investigators, and money for anti-gang programs throughout the region.⁷ Most of this money is for Mexico and reflects a willingness on the US to give more aid to Mexico and a willingness of Mexico to accept it.

However, tensions remain. Some Mexican officials are still bitter about the Alvarez Machaín case and have a profound distrust of US officials and agents operating in their country. The DEA, for instance, has to follow strict rules in Mexico. It is not operational, i.e., it cannot accompany local authorities on raids, inspections, undercover operations, etc. And it largely depends on local intelligence sources to gather information. The US is also mindful of the deep levels of corruption in Mexico, which they say sometimes reflect on the decisions regarding extradition.

For every top-level capo extradited from Mexico, there's an equally high-level cartel member who the US has requested that remains in a Mexican jail or whose extradition request was rejected outright. These include the cases of Alfredo Beltrán Leyva, a leader of the Beltrán Leyva Cartel, Mario Villanueva, a former governor, and Sandra Avila, the so-called "*Reina del Pacífico*" who was an accountant for the Beltrán Leyva organization.

Avila, for instance, was captured in 2007, along with her boyfriend, the Colombian citizen Juan Diego Espinosa. The US requested their extraditions, and the courts approved Espinosa's immediately, but Avila's remains hung up in the Mexican courts. Mexican authorities have rejected other requests outright. The most notable was that of Armando Pavón Reyes, a former policeman thought to have played a role in the escape of one of Camarena's killers.⁸

Some of these cases can be explained by looking closer at the extradition process itself, which includes a complicated appeals process available to anyone who is facing extradition in that country.

Any request goes through Mexico's foreign ministry, then to the attorney general's office. The attorney general's office studies the case's merits and, in effect, becomes its advocate when it passes it to the federal judge in the jurisdiction where the suspect is being held. The federal judge then issues an advisory to the foreign ministry, which has the final say on the extradition request.

An approved extradition is likely to elicit an appeal, or *amparo*. The *amparo* is something along the lines of *habeas corpus* in the United States, or *acción de tutela* in Colombia. It provides widespread "relief" for the appellate and, in this case, shifts burden of proof to the state, which must argue again for the extradition. The result is often months or even years of delays in extradition cases and frustration on both the US and Mexican sides. Nonetheless, the *amparo* is a sacred Mexican institution, making it a more potent tool to avoid extradition.

Nevertheless, the relationship between the two countries appears more positive than negative and may already be producing results, analysts say. In October 2009, two top-level members of the Arellano-Felix clan, being tried in the United States after their extraditions plead guilty. The cartel, which operates mainly in Tijuana, has been severely debilitated in recent months, possibly, as Martin Barrón, a professor at the *Instituto Nacional de Ciencias Penales* said, as a result of the increased number of members from this cartel who are in the United States and are cooperating with US agents and prosecutors.⁹

Other, more widespread effects can also be traced directly to extradition, specifically that of Osiel Cárdenas. His 2007 extradition left a void in the Gulf Cartel, which was partially filled by the cartel's military arm, known as the Zetas. Cárdenas departure also opened the way for a war over some of the cartel's routes, or *plazas* as they're known. Chaos has ensued and resulted in widespread arrests of various cartel members and leaders.

Venezuela – US: Closing the Door

Venezuela's extradition policy has not changed since President Hugo Chávez took over the country in 1999. Venezuela has always maintained a policy of not extraditing its citizens. However, the government has made contradictory decisions regarding the extradition of other foreign nationals, which call into question the independence of the judicial branch. Indeed, extradition policy appears to be an extension of the government's erratic behavior in most regards, which is why many drug traffickers from other countries, particularly Colombia, have resided there from time to time.

"The more traditional traffickers have discovered, from an interdiction and law-enforcement perspective, that Venezuela has now become a giant black hole where they have the least amount of resistance, the least amount of problems, and the cheapest route to get their product to market," a US law enforcement official said.¹⁰

Venezuela offers numerous advantages to traffickers, beginning with geography. The country shares a 1300-mile border with Colombia, the largest cocaine producer in the world. It also has a 1700-mile coast, brisk commerce in and out of numerous ports and long stretches of unpopulated and inhospitable territory. Corruption runs rampant, giving traffickers easy access to routes and protection from authorities.¹¹ Traffickers have purchased false Venezuelan IDs, obtained fake government security cards and hired police to protect them.

For his part, Chávez has effectively ended any cooperation between the United States and Venezuela on law enforcement issues. He began by suspending an agreement that authorized US surveillance of Venezuelan airspace. Chávez later ended communication between Venezuelan intelligence officials and the Drug Enforcement Administration (DEA). He followed that up by accusing the DEA of spying and cancelling an agreement that established a working relationship between DEA agents and a special Venezuelan task force. The agreement has not been renewed.

The result – analysts, government officials and anti-drug agents say – is that drug traffickers are using Venezuela as a safe-haven. The most cited example is Wilber Varela, a Colombian trafficker, who moved to Venezuela beginning around 2004. Authorities said he had police protection around the clock, even while he continued to operate the deadly North Valley Cartel that exported many tons of cocaine to the United States and Europe each month. He was killed in Venezuela by some of his own men in 2008.¹²

Other traffickers more adequately typify the double standard that Venezuela has with regards to extradition. One trafficker, Hermagoras González Polanco, had a false National Guard ID and had several National Guard personnel protecting him. Authorities captured González, a Colombian national with a \$5 million reward and an Interpol red alert attached to his name, in October 2006. The Interpol report said that González, who is wanted in the United States and Colombia, told the Venezuelan police that, "He had dedicated his whole life to farming," before they released him. González was captured again in 2008, but he has not been extradited.¹³

It's not just Colombians who escaped extradition in Venezuela. The Dominican Juan Mateo Holguín Ovalle, a drug trafficker who was captured in Venezuela in 2003, also remains in Venezuela, following a Supreme Court decision to deny the US' extradition request and to free him.¹⁴ The US government protested the decision to little avail. The Venezuelan Supreme Court also recently rejected the extradition of a former member of the Spanish terrorist group ETA.¹⁵

The cases stand out because Venezuelan law allows for the extradition of foreigners, and the Supreme Court, which has the final word on the cases, has extradited several high-profile suspects since Chávez took power in 1999. In 2001, Venezuela's Supreme Court approved the extradition of Jose Maria Ballestas,

an insurgent from Colombia's National Liberation Army (ELN) who took part in the hijacking of an airplane in Colombia in 1999. In 2006, Venezuela extradited Feris Faride Domínguez, a Colombian drug trafficker, back to Colombia to face charges on drug trafficking. Venezuela's Supreme Court has also approved the extradition of two members of ETA.

The Chávez administration, however, has never sent a suspect directly to the United States. In the Holguín Ovalle case, the Court initially opened the way for the Dominican to be extradited to the United States.¹⁶ But two years later, stating that the United States had not provided assurances that it would not sentence Holguín Ovalle for more than 30 years, which is the maximum sentence in Venezuela, the Court annulled the earlier decision and released Holguín Ovalle.¹⁷ In the González Polanco case, the Court has yet to decide.

Legal analysts consulted in Venezuela said that there is a clear political component to these decisions. Chávez, they said, controls the Supreme Court. The regional struggle between the United States and its allies, and Venezuela and its allies, plays out in the courts. "If they were going to extradite someone to Cuba, they would find a way to do it (no matter what). But if it were an extradition to the United States, they would find a reason not to do it. (Si iban a extraditar a alguien a Cuba, le harían la vuelta pero si fuera para Estados Unidos, encontrarían una razón para no hacerlo)," said Adolfo Salgueiro, the head of the law school at the Andrés Bello Catholic University.¹⁸

The same could be said for the United States, where some say the high-profile case of Cuban exile Luis Posada Carriles has illustrated just how close politics are to decisions regarding extraditions from that country as well. Declassified Central Intelligence Agency (CIA) and Federal Bureau of Investigation documents show how Posada Carriles was a CIA asset for years, while he worked with radical Cuban exile groups that sought to topple President Fidel Castro using terrorist tactics.¹⁹ These tactics included a series of bombings in Havana hotels in the 1990s, as well as the midair bombing of a Cubana Airlines flight over Barbados in 1976 that killed all 73 passengers on board.²⁰

Declassified documents, as well as testimony, link Posada Carriles to the bombing.²¹ Posada Carriles was arrested and sentenced in Venezuela in 1977, but he escaped in 1985. He was re-arrested and sentenced in Panama for plotting to kill Fidel Castro when he attended a conference in that country. While he was in Panama, the Venezuelan government requested his extradition. However, in 2004, Panamanian President Mireya Moscoso granted him amnesty instead.

Posada Carriles disappeared, then reappeared in the United States, where he was arrested and held for violating US immigration laws. Venezuela again requested his extradition. A US judge ordered him deported, but said he could not be sent to Venezuela or Cuba. After an appeal, a separate US judge dismissed part of the immigration charges and released Posada

Carriles on bail. Posada Carriles is currently residing in Florida, where he awaits the decision regarding the other charges in his case.²²

US officials refuse to comment on the case but have eluded to the possibility that Posada Carriles could be sent to Cuba via Venezuela, where he would face the death penalty for attempting to assassinate Fidel Castro.²³ Yet, it's clear there is a political component to this case. Attorney General Alberto Gonzales refused to designate Posada Carriles as a terrorist. And regardless of whether the US extradites Posada Carriles, US authorities could have prosecuted him for terrorist acts using the Patriot Act but have yet to file charges.

In his testimony before US Congress in 2007, National Security Archive Analyst Peter Kornbluh said: "I dare say that had this crime been committed more recently, and if Posada's first name was Mohammed rather than Luis, this evidence would have been more than sufficient to get him rendered to Guantanamo Bay, Cuba. And it would seem sufficient to have allowed former Attorney General Alberto Gonzales to have certified Posada as a terrorist under the clauses of the Patriot Act rather than engage in a dubious and failed attempt to prosecute him as a simple illegal alien. And sufficiently as well to grant Venezuela's petition that he be extradited back to Caracas, where he remains an international fugitive from justice in this case."²⁴

Venezuelans are also angry with this decision. José Vicente Rangel, while he was Vice-president of Venezuela, aptly described the US duplicity to a Cuban journalist: "It is necessary to have a coherent position in the war against terrorism: one must condemn it or one must participate in it, there are no ambiguous policies or half-measures." (Hay que tener una posición muy coherente en la lucha contra el terrorismo: se le condena o se participa de ella, no hay políticas ambiguas, ni términos medios).²⁵ Some Venezuelan analysts, regardless of their position on Chávez or Cuba, have expressed similar sentiments: "It is an insult the way they have managed the compliance of this issue. The conclusion achieved by the justice system is based on political reasons." (El manejo es insultante en cuanto a la cuestión de cumplimiento. La gente lo percibe de esa manera. La conclusión que saca la justicia se maneja de una manera política), Salgueiro said.²⁶

The US has taken the same position on the case of two army officers accused in Venezuela of planting explosives in Caracas in 2002. The Venezuelan government accused Lieutenant José Antonio Colina and Lieutenant Germán Varela of bombing the Spanish embassy and the Colombian consulate to foment fear and chaos, in an attempt to undermine the Chávez government.²⁷ The two fled to Miami before they could be prosecuted, where US immigration officials arrested them. The US government, however, refused the Venezuelan extradition requests and freed the two men, citing the fear they would be tortured if they were returned to Venezuela.²⁸

Conclusion:

Comparing Colombia, Mexico and Venezuela, and their relationship with the United States vis-à-vis extradition, one can see how similar the processes and rules are in each country. The protocols are virtually identical and the procedure – ensuring identity of the accused, avoiding double jeopardy and persecution for political crimes, and regulating accusations and penalties that do not exist in the extraditing country – are very similar. There are, however, some critical differences.

In Colombia and Mexico, the executive branch has the final say; in Venezuela, the Supreme Court decides. In addition, in Mexico the accused has more recourse to appeal the decision. The ability to present an *amparo* gives the accused far more power than the accused in Colombia. What's more, the burden of proof appears to be higher in both the Mexican and Venezuelan cases, than it is in Colombia.

Perhaps the most critical difference relates to the extradition of nationals. In Venezuela, it is strictly prohibited. In Mexico, it has been subject to wide interpretations, which can, at any moment swing back towards a strict interpretation of whether or not it is permitted under Mexican law to extradite nationals. And in Colombia, nationals are extradited at rates the world has never seen.

Regardless of the differences in regulations concerning extraditions, there is one constant that seems to supersede all others: the relationship that each country has with the requesting country. Colombia, Mexico and Venezuela have very distinct political relationships with the United States. While Colombia and Mexico work closely with US authorities on judicial and other law enforcement matters, Venezuela has distanced itself from the US in all political and judicial matters. These relationships have a direct impact in how often or rarely the judicial and executive branches of these governments extradite suspects to their counterparts. While each country contends that its judicial branches are separate and have their own inherent powers related to upholding the law, it's clear, if we observe how these extradition cases are resolved, that judicial authorities' independence is questionable at best, compromised at worst.

Recommendations:

For United States Government:

Find a coherent strategy to fight terrorism and, by extension, implement their extradition policy. The double standard in the case of Luis Posada Carriles calls into question the principals in the fight against terror and the demands they place on other nations vis-à-vis extraditions. It is necessary to apply the same criteria to potential criminals under their control as one would hope other nations would apply with accused criminals he hopes to prosecute.

For the Venezuelan Government:

Reestablish extraditions to the United States, when appropriate. There's an acceptable justification in not extraditing nationals to foreign nations, but there's also a need to cooperate on judicial matters that go beyond the whims of any administration, a mutual dependency that requires that protocol and legal procedure supersede any political animosity. Attempts to honor these codes can often be the first step in reestablishing a more harmonious relationship.

For the Mexican Government and Judicial Authorities:

Strive for consistency. The results of recent changes in policy and the interpretation of the laws governing extradition have opened the door to a record number of extraditions between the US and Mexico. However, some important cases remain mired in the system and others have resulted in contradictory decisions. Mexican judicial authorities should seek more uniformity and consistency so that those who break the law in a foreign country understand the consequences.

- ¹ Interview with US diplomat who preferred anonymity.
- ² Extradition Treaty, Mexico – United States, (D.O. 26-II-1980).
- ³ United States vs. Alvarez-Machain, 504 U.S. 655 (1992).
- ⁴ Treaty between the US and Mexico to halt cross-border kidnappings. November 23, 1994.
- ⁵ Registro No. 174903. Novena Época. Semanario Judicial de la Federación y su Gaceta. XXIII, June 2006, p. 6.
- ⁶ "México extradita a once criminales indiciados Procuradores Generales se reúnen en Washington, D.C.". Press Release, US Embassy Mexico, November 1, 2009.
- ⁷ "Status of the Funds of the Mérida Initiative". General Accounting Office, Report 10-253R, December 3, 2009.
- ⁸ "Negada extradición en caso Camarena". *El Universal*, November 2, 2006.
- ⁹ Interview with Martin Barrón, researcher and professor at the National Institute for Penal Law (Instituto Nacional de Ciencias Penales).
- ¹⁰ Interview with US law enforcement agent that preferred anonymity.
- ¹¹ In Transparency International's annual Corruption Perception Index for 2009, only Haiti ranked lower than Venezuela.
- ¹² "Drug boss shot dead". *Sunday Herald Sun*. Australia, February 3, 2008.
- ¹³ "Venezuela Cited for Drugs". *Washington Times*, March 10, 2009.
- ¹⁴ "Bribes Let Smugglers Use Caracas Airport". *The Miami Herald*, April 20, 2006.
- ¹⁵ "Venezuela Court rejects extradition of ETA suspect". *Associated Press*, August 6, 2009.
- ¹⁶ Venezuelan Supreme Court Decision 2003-0471, February 17, 2004.
- ¹⁷ Venezuelan Supreme Court Decision 03-0471, March 21, 2006.
- ¹⁸ Interview Adolfo Salgueiro, the head of the law school at the Andrés Bello Catholic University.
- ¹⁹ "Posada Carriles Built Bombs for, and Informed on, Jorge Mas Canosa, CIA Records Reveal". National Security Archive, October 6, 2009.
- ²⁰ Ibid.
- ²¹ Ibid.

- ²² “Venezuela Will Push U.S. to Hand Over Man Tied to Plane Bombing”. *The New York Times*, January 23, 2009.
- ²³ “US Rejects Venezuelan Move on Extradition of Bombing Suspect”. *The New York Times*, May 28, 2005.
- ²⁴ “Luis Posada Carriles and the Bombing of Cubana Flight #455”. Testimony of Peter Kornbluh, Senior Analyst, National Security Archive, before the House Foreign Affairs Subcommittee on International Organizations, Human Rights, and Oversight, November 15, 2007.
- ²⁵ Interview Jose Vicente Rangel, *Sistema Informativo de la Televisión Cubana*, February 21, 2006.
- ²⁶ Interview with Adolfo Salgueiro, the head of the law school at the Andrés Bello Catholic University.
- ²⁷ “Venezuelans Asking the U.S. To Extradite 2,” *The New York Times*, January 29, 2004.
- ²⁸ “Noteworthy”. *St. Petersburg Times*, April 27, 2006.

