INSTITUTE FOR THE ADVANCEMENT OF JUSTICE & HUMAN RIGHTS

The Equivalence Representation and the Ex Post Facto Lockout

Why United States compliance with the Convention against Torture is not a political question awaiting congressional action; why the new offence a congressional cure supplies can never criminally punish the conduct of the past; and how the lockout is prevented

An IAJ Thesis. Companion to UNCAT and jus cogens: A contemporary perspective; A Guide to Domestic Criminal Enforcement of Torture and Cruel, Inhuman, or Degrading Treatment in the United States; the IAJ Collaborative Prosecution Framework; the IAJ Prosecutor Memorandum and Record of Notice; the IAJ Prosecutorial Misconduct Standard; and the IAJ memorandum On the Duty of the Legislatures of the United States to Complete the Nation's Compliance with the Convention against Torture.

I. The Deadlock Stated

In 2014 the Committee against Torture recorded that no general federal offence of torture, defined in conformity with Article 1, reaches conduct within the United States (CAT/C/USA/CO/3-5, para. 9). The apparent cure is legislative: Congress enacts the missing offence. This thesis states what that cure, standing alone, cannot do — and the trap its naive enactment would spring.

The Ex Post Facto Clauses of the Constitution (art. I, § 9, cl. 3; § 10, cl. 1) make any new offence prospective only. A statute enacted today to answer the Committee's 2014 findings would therefore arrive constitutionally incapable of criminally punishing, under its new offence, the very record that prompted those findings — the Chicago police-torture cases and the decades of conduct the Committee reviewed. What the new offence cannot do is charge the past; what legislation can lawfully do for the past record — investigation, preservation, truth-finding, declaratory findings, and, where enacted with the requisite clarity, civil redress in performance of Article 14 — is different in kind, and is addressed in Parts VIII and X. The incapacity, moreover, is not the worst of it: an enactment made without care invites the inference that the conduct of the past was not criminal until the new statute made it so: the cure would be read as a confession that the past was never punishable, converting the Committee's remedy into a certification of impunity. That is the deadlock. It dissolves on one condition only: that the law in force when the conduct occurred already reached it. Whether it did is not an open question. The United States answered it, in writing, when it ratified.

II. The Ratification-Era Representation of Equivalence

On advising consent to UNCAT, the United States represented to the Senate — and, through the ratification record and every subsequent periodic report, to the Committee against Torture and to the world — that existing federal and state law already discharged the substance of the Convention. The representation is not a gloss on the record; it is the stated basis for the instruments the United States actually adopted. Each passage below is quoted exactly, verified against page images of the report.

The non-self-execution declaration rests on it. The Senate report explains the declaration for Articles 1 through 16 on this express ground: *"Since the majority of the obligations to be undertaken by the United States pursuant to the Convention are already covered by existing law, additional implementing legislation will be needed only with respect to article 5, dealing with areas of criminal jurisdiction."* S. Exec. Rep. No. 101-30, at 10 (1990). Non-self-execution is thus presented not as a deferral of substance, but as a label over law already in force.

The Article 4 analysis is categorical. After surveying the Fifth, Eighth, and Fourteenth Amendment protections and the color-of-law criminal statutes, the report concludes: *"In view of the above, it appears that the conduct of "torture" within the United States or U.S. jurisdiction will violate some federal or state criminal law. Existing law is therefore sufficient to implement Article 4, except to reach torture occurring outside U.S. jurisdiction."* Id. at 19; see id. at 18–19 (the survey). The Article 5 discussion confines the admitted gap with precision: *"Implementing legislation is therefore needed only to establish Article 5(1)(b) jurisdiction over offenses committed by U.S. nationals outside the United States, and to establish Article 5(2) jurisdiction over foreign offenders committing torture abroad who are later found in territory under U.S. jurisdiction."* Id. at 20. Both were supplied by 18 U.S.C. § 2340A, in force since 1994.

The representation was made directly against the legality objection. Answering Senator Helms's concern that no one may be tried without a statute defining the crime, the Department of State's reply states: *"Any prosecution (or civil action) in the United States for torture will necessarily be* *pursuant to existing or subsequently enacted Federal or State law. In fact, as indicated in the original Presidential transmittal, existing Federal and State law appears sufficient to implement the Convention."* Id. at 41 (letter of Janet G. Mullins, Assistant Secretary, Legislative Affairs, to Senator Helms, June 13, 1990). The treaty supplies no independent cause of action because the existing criminal law already does the work.

The one concession. The single obligation the record concedes as broader than then-existing law is cruel, inhuman, or degrading treatment not amounting to torture: *"Article 16 is arguably broader than existing U.S. law."* Id. at 25. The report resolves the point by the reservation confining CIDT to Fifth, Eighth, and Fourteenth Amendment scope. By the equivalence record's own terms, the admitted delta is CIDT-scope — not core torture.

III. Enactment Verification Against the October 21, 1994 Deposit

Each criminal statute on which the enforcement analysis relies is verified against the date of deposit of the United States instrument of ratification, October 21, 1994.

Pre-existing ratification — verified. 18 U.S.C. § 242: Civil Rights Act of 1866 / Enforcement Act of 1870 lineage, codified in current form in 1948 (62 Stat. 696); Screws v. United States, 325 U.S. 91 (1945), construed it half a century before deposit. § 241: Enforcement Act of 1870 lineage, codified 1948. §§ 1512 and 1513: Victim and Witness Protection Act of 1982, Pub. L. No. 97-291 — twelve years before deposit. § 1001: current form from the 1948 codification, with lineage to 1934 and earlier. State criminal law: the original execution architecture for matters within state jurisdiction, in force throughout.

§ 2340A deserves its own sentence. Enacted April 30, 1994, Pub. L. No. 103-236, § 506, it pre-dates the deposit but post-dates Senate consent (1990) — and that sequence is not a weakness; it is the strongest single confirmation of the equivalence architecture. The Senate report carried the recommended declaration that *"The United States will not deposit the instrument of ratification until after the implementing legislation of the Convention has been enacted."* S. Exec. Rep. No. 101-30, at 20; see id. at 37, 41, 43. Congress enacted § 2340A to fill exactly and only the two gaps the record admitted — Article 5(1)(b) and Article 5(2) extraterritorial jurisdiction — and the Executive then deposited. The gap-filling was surgical, and its surgical character is a construction by conduct of everything Congress did not touch.

Post-dating ratification — flagged, never folded into the pre-existence claim. § 1519 (Sarbanes-Oxley Act, 2002); § 249 (Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act, 2009); § 3286(b) (post-2001). These later enactments supplement the charging toolkit and carry their own significance — Congress legislating repeatedly in the adjacent field since 1994 without disturbing or contradicting the equivalence baseline — but they form no part of the 1990–1994 representation and are never cited as evidence of the ratification-era construction. The pre-existence verification above is what the two-branch foreclosure and the plane-split analysis stand on: for the pre-existing core, application of law in force when the conduct occurred raises no ex post facto question at all.

IV. The Two-Branch Foreclosure

The equivalence representation and the political-question posture cannot both stand. The IAJ records the following as an independent determination, supported by the ratification record and answered against any contrary holding.

First branch. If the representation is true, there was never an implementation gap for core torture, and nothing was ever "awaiting Congress." Prosecution was available under existing law — 18

U.S.C. §§ 241 and 242, state criminal law, and, from 1994, § 2340A — from the moment the Convention entered into force for the United States. A court that declines to apply that existing supreme law, and defers instead to a hypothetical future enactment, abdicates the duty to apply law already on the books (U.S. Const. art. VI; Marbury v. Madison, 5 U.S. (1 Cranch) 137 (1803)). The political-question framing is, on this branch, simply false to the record.

Second branch. If the representation is false, then the United States misrepresented its compliance to the Senate, to the Committee, and to the world for the entire period since ratification, and the impunity that follows is a breach of the Convention — not a defense to it. A State may not invoke the inadequacy of its own internal law to escape performance of an international obligation (VCLT art. 27, invoked as customary international law; the United States is not a party to the VCLT).

Either branch defeats the proposition that compliance awaits congressional action. The dodge either contradicts the ratification record or converts that record into an admission of decades-long breach. And the branches operate conduct by conduct, not wholesale: to whatever extent the representation held, the first branch governs and existing law was always available; to whatever extent it failed, the second branch governs and the failure is the breach. A representation partially true divides the record between the branches and rescues the political-question posture nowhere.

V. The Ex Post Facto Question, Resolved by Plane

The retroactivity objection is not uniform. It turns entirely on whether the conduct was already criminal when committed, and it operates differently on the two planes the IAJ keeps distinct.

Plane A — obligation content. At the plane of obligation content, the prohibition of torture is a peremptory norm and was criminal under the general principles of law recognized by the community of nations long before 1994. The legality principle is satisfied by that pre-existing prohibition (Prosecutor v. Furundžija, ICTY Case No. IT-95-17/1-T, Judgment (Dec. 10, 1998)). Ex post facto therefore poses no obstacle to characterizing the ratification-era torture record as criminal, and none to State or individual responsibility at this plane. Non-implementation is the breach; it furnishes no justification. The IAJ's full interpretive standard for the Convention and the peremptory norm is stated in its companion thesis UNCAT and jus cogens: A contemporary perspective.

Plane B — enforcement reality. At the plane of domestic enforcement, the analysis splits by coverage. For conduct already reachable when committed — the large body of torture within United States jurisdiction addressed by §§ 241, 242, and state law, and extraterritorial torture from 1994 under § 2340A — there is no retroactivity problem whatsoever: applying law that existed when the act occurred is not ex post facto. Here the thesis is at its strongest, and "we need Congress first" is a fabricated obstacle.

For the residual delta — conduct UNCAT classifies as torture or CIDT that fell outside § 242's constitutional calibration and outside § 2340A's extraterritorial reach — the domestic Ex Post Facto Clauses do operate, and no invocation of jus cogens permits a United States court to manufacture a domestic crime retroactively. The IAJ records the resulting impunity as a documented equivalence failure — not a carve-out, and not a doctrinal permission running to the courts. The lockout on this residuum is a constraint the Supreme Court cannot waive; it is not a license the Court is free to exercise. The IAJ maintains this position as the standard-setter and treaty and jus cogens interpreter: the Ex Post Facto Clauses are honored here as a legality protection of the accused — the same fair-warning value this corpus honors in full — and never as an immunity of the State or its officers; the residuum they cover is recorded on Plane A as the

United States' own failure of equivalence; and the accountability continuum remains unbroken, because the State-responsibility and obligation-content tracks of Part VIII run in full across it.

VI. ICCPR Article 15(2): The Nuremberg Clause Is Operative Against the United States

The retroactivity fight the equivalence record might otherwise invite is foreclosed at the treaty level as well. The United States' reservation to Article 15 of the ICCPR is surgically narrow: because United States law applies the penalty in force at the time of the offense, the United States declined only the third clause of paragraph 1 — the lex mitior provision affording an offender the benefit of a later, lighter penalty. That reservation is defendant-favorable and touches nothing else.

Article 15(2) — preserving the trial and punishment of any person for an act that was criminal, when committed, according to the general principles of law recognized by the community of nations — was not reserved and is non-derogable (ICCPR art. 4(2)). The Nuremberg clause thus stands in full force against the United States, and the legality point on Plane A rests on treaty text the United States accepted, not merely on custom. The parallel United States reservation to Article 7 (confining CIDT to Fifth, Eighth, and Fourteenth Amendment scope) is the ICCPR twin of the UNCAT Article 16 reservation; the same CIDT-scope boundary recurs in both instruments, reinforcing that the admitted gap is CIDT-scope rather than torture. The two depositary records are kept separate: three States lodged formal objections to the UNCAT reservations (Finland, the Netherlands, and Sweden, February 1996), and the ICCPR objection record is its own record, never merged with the UNCAT count.

VII. Congress and Court: The Apparent Tension Dissolved

The cure and the characterization are different objects, and separating them dissolves the tension between "Congress must enact" and "the Court must apply." Medellín v. Texas, 552 U.S. 491 (2008), operates here as the implementing-statute engine identifying the constitutional cure: it assigns the filling of a genuine statutory gap to Congress, and only prospectively. That is the narrow thing it holds.

Characterization and application belong to the Court, and occupy the space Medellín leaves untouched — the already-existing domestic law the equivalence record itself identifies. The Court's task is to decline the political-question dodge, apply the existing statutes that already reach the conduct, and hold the United States to its own equivalence representation. Because a Congress-only framing immunizes the ratification-era record and contradicts that representation, the honest characterization is judicial duty, not political discretion. This requires no overruling of Medellín; it operates outside its holding.

VIII. What the Lockout Never Reaches

The argument must not overstate the lockout in either direction. Two tracks survive it entirely, and they survive concurrently — never as alternatives.

State responsibility and reparation are not criminal and are untouched by any ex post facto constraint. For a wrong attributable to a judicial or other State organ, the State bears responsibility and owes reparation for the full period (ILC Articles on State Responsibility arts. 4, 31; ICCPR art. 2(3); UNCAT art. 14). This track runs regardless of the domestic criminal residuum.

Individual responsibility is concurrent and complementary, never a substitute (ILC art. 58). The State answering never absolves the individual, and the individual answering never absolves the

State. The torture/CIDT threshold governs the individual's exposure: below it, judicial immunity legitimately shields the honest, erring judge and reparation runs against the State; at or above it, immunity falls away absolutely and is never available for a jus cogens wrong — stated absolutely — and the individual is personally liable, concurrently with the State (criminal accountability mandatory under UNCAT arts. 4–7; personal civil liability where law provides, e.g., the Torture Victim Protection Act, in its field of conduct under actual or apparent authority, or color of law, of a foreign nation). The honest judge is protected by the threshold, not by any State-only rule.

Citation precision. The International Law Commission's 2022 Conclusions on jus cogens (A/77/10) leave the specific consequences of particular peremptory norms — including immunity — deliberately open in Draft Conclusion 22, the "without prejudice" clause: a non-endorsement of the override, not an approval of it. Draft Conclusion 22 is not to be confused with Draft Conclusion 23, which governs the non-exhaustive Annex listing the prohibition of torture.

IX. The Anti-Lockout Drafting Rule

The deadlock of Part I has a legislative cure of its own, and it costs one clause. Every implementing enactment answering the Committee's findings — federal or state — must carry an express construction provision preserving the pre-existing execution architecture. The IAJ states the required content as follows:

> *Nothing in this Act shall be construed to imply that any act of torture committed before its effective date, or any act of cruel, inhuman, or degrading treatment that was punishable under law in force at the time of its commission, was not punishable under the law then in force — including 18 U.S.C. §§ 241 and 242, the criminal law of the several States, and, for conduct outside the United States, 18 U.S.C. § 2340A; and nothing in this Act displaces, narrows, or supersedes any such law, or any duty to enforce it.*

With that clause, enactment and prosecution of the past run concurrently: the new offence governs the future, the pre-existing architecture governs the past, and the statute itself forecloses the impunity inference. Without it, the cure creates the lockout — the new statute cannot reach back, and its silence is pressed as proof that nothing ever did. The clause performs by text what § 2340A's surgical gap-filling performed by conduct in 1994: it fixes the meaning of what Congress did not touch. The corresponding legislative measures are stated in the companion memorandum On the Duty of the Legislatures of the United States to Complete the Nation's Compliance with the Convention against Torture; the prosecutorial duties that do not wait for any enactment are stated in the IAJ Prosecutor Memorandum and Record of Notice and A Guide to Domestic Criminal Enforcement of Torture and Cruel, Inhuman, or Degrading Treatment in the United States, with the joint state–federal protocol in the IAJ Collaborative Prosecution Framework.

Preservation alone is not administration. A fourth component completes the architecture: when pre-effective-date conduct is addressed under the preserved pre-existing law — the only law that may criminally reach it — the competent authorities must administer that law to deliver the closest lawful equivalent of what the new statute secures for the future. The IAJ states the required content as follows:

> *Functional-equivalence application to pre-effective-date conduct. No prosecution may be brought under the offence created by this Act for conduct preceding its effective date; such conduct shall be addressed, where legally reachable, through the federal and state law in force at the time of its commission. In every post-enactment investigation, prosecution, civil action, administrative or disciplinary proceeding, victim-compensation or reparations process, treaty-reporting process, or gap memorandum concerning such conduct, the competent authority shall construe and administer the preserved pre-existing law to the maximum extent permitted by the Constitution and by law, so as to secure remedies, relief, accountability, punishment proportionate to gravity,*

> *redress, rehabilitation, satisfaction, guarantees of non-repetition, and documentation functionally equivalent to the outcomes this Act secures for conduct occurring after its effective date. Where pre-existing law cannot lawfully supply an equivalent result — by reason of statutory text, fair-warning limits, limitation periods, evidentiary insufficiency, jurisdictional or remedial limits, or the absence of a domestic vehicle — the competent authority shall record the shortfall as an implementation gap under the Convention against Torture and shall preserve that record for legislative, prosecutorial, treaty-reporting, and public-accountability purposes.*

The clause is a one-way instrument, and its boundaries are the Constitution's. It commands equivalence up to the lawful maximum, never beyond it: it does not and cannot enlarge a penalty retroactively, revive a limitation period that has lapsed, or apply the new offence backward. What it adds is direction and record: the preserved architecture is administered toward the Convention's outcomes — the forms of redress General Comment No. 3 states: restitution, compensation, rehabilitation, satisfaction, and guarantees of non-repetition — and every shortfall becomes a documented gap rather than a silent one. The framework thus has four parts: the new offence punishes the future; the construction clause preserves the past; the declaratory findings of Part X defeat the impunity inference; and the functional-equivalence clause holds the preserved law, applied after enactment, to the treaty's full lawful measure.

X. The Conjunctive Reading and the Declaratory Statute

An objection must be met at the level of the corpus itself, because it will be pressed. The IAJ's instruments state that existing law reaches domestic torture; the Committee's 2014 findings state that the United States lacks a general statute to prosecute it. Read as alternatives, one of the two must yield. The IAJ reads them conjunctively, and records the conjunctive reading as its institutional interpretation of CAT/C/USA/CO/3-5, paragraph 9: the United States must perform the equivalence it promised through the existing mechanisms it represented — and must legislate, at both the federal and the state level, to clarify, streamline, and ensure the relief, remedy, and punishment those mechanisms were represented to supply. The demand for a named offence is not a finding that no law reaches the conduct. The Committee's own doctrine states the rationale: naming torture as a crime in its own right alerts everyone to the special gravity of the crime, strengthens its deterrent effect, permits the conduct to be tracked as itself, and forecloses the definitional slippage that fragmented charging invites (General Comment No. 2, paragraphs 8–11). That is a clarify-and-concentrate rationale, and it presupposes that the conduct is otherwise reachable.

The distinction that resolves the record is between equivalence as reach and equivalence as operation. As reach, the representation held: the combined federal and state law of 1994 extended to core torture, as Part II establishes from the record's own words. As operation, it failed: the law lay scattered across two sovereigns' codes under other names — assault, homicide, official misconduct, deprivation of rights — coordinated by no statute, tracked by no ledger, and absent from the foreground consciousness of the officials who were its intended instruments. The Chicago record is the proof of operation-failure, not of reach-failure: the conduct violated the law in force; what failed was the machinery, and the mind, that should have enforced it. The failure of equivalence is the fragmentation and the non-implementation, domestic and institutional; it is not, for core torture, an absence of law.

From the conjunctive reading follows the affirmative sibling of the construction clause of Part IX: the declaratory statute. The findings of every implementing enactment must state, in the enactment's own text, how the promised equivalence was to have worked, how it failed in operation, and that the new offence clarifies, concentrates, and streamlines — as to conduct after its effective date — the pathway of prosecution and accountability that has existed since ratification, to which the statute is equivalent and of which it is not the origin. A statute so drafted defeats the impunity inference by its own text: the enactment cannot be read as a confession that the past was never punishable, because the enactment says the opposite on its face. It performs by express findings what § 2340A's surgical gap-filling performed by conduct. The IAJ states the required content as follows:

> *Findings and declaration. The Congress [the Legislature] finds that the United States ratified the Convention against Torture on the representation, stated in the ratification record, that acts of torture within the United States were already criminal under existing federal and state law, and that implementing legislation was required only for the extraterritorial jurisdiction supplied by 18 U.S.C. § 2340A before deposit; that the represented architecture was a combined state–federal architecture; that its failure has been one of operation — fragmentation, non-coordination, and the absence of a named offence — and not, as to torture, one of reach; and that this Act therefore clarifies, concentrates, and streamlines, as to conduct after its effective date, the pathway of prosecution and accountability that has existed since ratification, to which this Act is equivalent and of which it is not the origin. As to cruel, inhuman, or degrading treatment beyond pre-existing law, and the enforceable right of victims to redress, this Act is supplementary and prospective. Nothing in this Act shall be construed to imply that any act of torture committed before its effective date, or any act of cruel, inhuman, or degrading treatment that was punishable under law in force at the time of its commission, was not punishable under the law then in force, or to permit prosecution under this Act of conduct preceding its effective date.*

Two limits bound the declaration, and the IAJ states them so that the position cannot be overrun at its strongest claim. First, the declaration characterizes; it does not charge. No finding, however drafted, makes the new offence a retroactive charging vehicle: the Ex Post Facto Clauses govern regardless of the label, and a limitation period that has lapsed may not be revived (Stogner v. California, 539 U.S. 607 (2003)), though an unexpired period may be extended. Prosecution of pre-enactment conduct proceeds under the pre-existing architecture alone; the declaration's operative force is that it places the ratification-era representation in the statute books as a formal legislative record supporting the UNCAT-consistent construction of the pre-existing vehicles, rebutting the negative implication, and standing as the State's own account on the plane of obligation content. And because the findings restate the documented record — the Executive's representation, the Senate's acceptance, the surgical supplement, the deposit — they do not depend on the disfavored device of a later legislature declaring the meaning of an earlier one's enactments; they recite history, not reinterpretation. Second, the declaration must match the record's own concession: declaratory and concentrating as to core torture; supplementary and prospective as to the cruel, inhuman, or degrading treatment the record conceded as arguably beyond existing law, and as to the enforceable right of victims to redress under Article 14 — the residual delta Part V records as the equivalence failure. The same findings structure governs at both levels: each State's enactment carries it for the State's own architecture, as the combined system requires.

XI. Systemic-Failure Record

Where this analysis enters the field of congressional power to immunize jus cogens violations — the no-limiting-principle reasoning of Saleh v. Bush, 848 F.3d 880 (9th Cir. 2017) — the IAJ prominently records that holding as a documented instance of systemic judicial failure regarding United States compliance with UNCAT and jus cogens. That record is grounded in Article VI treaty supremacy, in the ratification-record representation of equivalence set out in Part II, and in the Marbury premise that a court must apply supreme law already in force. Contrary holdings that would immunize peremptory-norm violations (Jurisdictional Immunities of the State (Germany v. Italy), 2012 I.C.J. 99; Jones v. United Kingdom, ECtHR App. Nos. 34356/06 and 40528/06 (2014); Stump v. Sparkman, 435 U.S. 349 (1978); Mireles v. Waco, 502 U.S. 9 (1991)) are recorded and answered as failures of those tribunals to give effect to the peremptory norm — never inserted as carve-outs, exceptions, or qualifications to the IAJ's determination.

XII. Determination

Compliance of the United States with UNCAT is not a political question awaiting congressional legislation. For core torture, the ratification record establishes that existing law was always sufficient, and applying that law to conduct already criminal when committed raises no ex post facto question. For the CIDT residuum the record itself concedes, the domestic Ex Post Facto Clauses constrain the criminal track — a failure of equivalence, recorded as such, not a legitimate limit and not a permission to the courts. A prospective enactment answering the Committee's 2014 findings can never criminally punish pre-enactment conduct under its new offence, though it may lawfully serve the past record through investigation, truth-finding, declaratory findings, and civil redress; enacted without the anti-lockout clause of Part IX, it would invite the false inference that the past was never punishable at all, and would convert the Committee's remedy into a certification of impunity. Ex post facto may never be invoked to defeat State responsibility or reparation, never to defeat individual responsibility at the plane of obligation content, and never — for torture already criminal when committed — to block criminal prosecution. The past is not immunized; the concurrent State and international tracks carry whatever the domestic criminal residuum does not; and the legislative and prosecutorial duties run together, neither waiting on the other. The Committee's 2014 findings are read conjunctively — performance through the represented existing mechanisms, and legislation that clarifies, concentrates, and ensures — so that the cure and the characterization reinforce, and never contradict, one another. Authorities support the IAJ's determinations; they do not decide them.

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