

SUBSTANCE

Fair trial /right to have one's cause heard – article 7

Extrajudicial execution – investigation

In *Zongo* the Court held that the duration of the investigation (just under eight years) was unreasonable in the circumstances of the matter and the resources available to the state: 'Due diligence obliges the State concerned to act and react with the dispatch required to ensure the effectiveness of available remedies' (para 152). The Court held that the authorities should have explored other areas of investigation mentioned by the Independent Commission of Enquiry and continued the investigation after the Order to terminate proceedings against the principal accused in August 2006 (*Beneficiaries of late Norbert Zongo, Abdoulaye Nikiema alias Ablasse, Ernest Zongo and Blaise Ilboudo & The Burkinabe human and peoples' rights movement v Burkina Faso*, application 013/2011, judgment, 28 March 2014, para 153).