

Mexican Judicial Reforms, 2021

1. Executive Summary

In 2021, President of the Supreme Court, Arturo Zaldívar Lelo de Lara hailed the latest judicial reforms as “the most important [reforms] in almost 30 years.”¹ The Mexican judiciary began slowly reforming in 1994, with some major reforms for human rights pursued after 2011. Even so, critics expressed skepticism that Zaldívar’s 2021 reform package is truly all that it appears to be. If there is consensus on one thing, however, it is that Zaldívar’s reforms came at a pivotal moment in the nation’s history, with Mexican President Andrés Manuel López Obrador’s authoritarian tendencies soon to be tested through popular referendum.

While the 2021 reforms are indeed nowhere near as monumental as Zaldívar has promised them to be, his politicking did prevent other reforms from becoming law which would have threatened the independence and legitimacy of the judiciary. The reforms are thus notable more for what they prevented than for what they actually were. Nevertheless, the reforms did effectively centralize the power of the judiciary in the National Supreme Court (“SCJN”) while, apparently, professionalizing and expanding access to judicial positions through statutory requirements. Though the ultimate effect of these reforms cannot be known for some time, it appears, at least initially, that their impact on corruption and nepotism in the judiciary will remain minimal.

2. Motivations for the Reforms

Understanding the 2021 reforms requires a step back to first consider President Lopez Obrador’s 2017 presidential campaign and the presentation of the *Proyecto de Nación* 2018-

¹ Consejo de la Judicatura Federal México, *La Gran Reforma Judicial del Año 2021* [*The Great Judicial Reform of 2021*], YOUTUBE (Jan. 10, 2022), <https://www.youtube.com/watch?v=7TXfZJg-JkM&t=821s>

2024. In it, Lopez Obrador set out in over 400 pages what he promised he would implement in the country if he was elected president as well as the reasons for the changes he proposed, expressly stating that this project was meant to resolve “stagnation, deterioration, inequality, and corruption”.² Among the topics of reform included in the *Proyecto de Nación* was criticism of the judiciary as ineffectual and wasteful.³ As a result, propositions within the *Proyecto de Nación* itself included solutions such as the popular election of supreme court judges, the abolition of the current independent vetting body for the judiciary (the Consejo de la Judicatura Federal, or CJF), and the creation of a separate court within the SCJN to vet sitting judges.⁴

Although reforms to the judiciary were put on the backburner following President Lopez Obrador’s 2018 victory, in 2019, leaders in his political party, the Movimiento Regeneración Nacional (commonly referred to as Morena), began signaling their support for some of the previously mentioned reforms and other similar reforms not included in the *Proyecto de Nación*. At this point, President of the SCJN Arturo Zaldívar began publicly criticizing the judiciary. Starting with public statements he made and posted on his Twitter account on November 11, 2019, Zaldívar exhorted, “If the judicial powers do not reform ourselves, if we do not reflect on what we have left to achieve and work on, I fear that we may face a crisis whereby [they] put at risk the judiciary’s autonomy and judicial independence.” He then added, “self-criticism and self-reform are fundamental to strengthen the independence of the #PJs.”⁵ In a January 21, 2021 statement at the Universidad Nacional Autónoma de México (“UNAM”), Mexico’s most prominent university, President Zaldívar summed up what problems he hoped to address through the reforms he heralded with the congress and President that same year:

² NATIONAL REGENERATION MOVEMENT, *PROYECTO DE NACIÓN 2018 – 2024* (2018).

³ *Id.* at 71.

⁴ *Id.* at 72

⁵ Arturo Zaldívar (@ArturoZaldivarL), TWITTER (Nov. 11, 2019; 9:00 PM), *translated by author* <https://twitter.com/arturozaldivarl/status/1193891106909343744?lang=ar>.

I said we had to be self-critiquing. That the Judicial Power, without negating its virtues, had serious problems that had to be tended to. The corruption, though not generalized nor widespread, exists and has existed for more than two years in an important way.

Nepotism, which was a culture in the Judicial Power that was not negatively seen nor illegal, of course, but which generated conflicts of interests, familial networks, and a very bad image in the society of the Federal Judicial Power, [as well as] uncontrolled spending during a period of republican austerity when it was necessary to attend to ... problem[s] of sexual harassment that also were a culture within the Federal Judicial Power, to take measures to advance towards gender parity ...⁶

Thus, Zaldívar began working with Lopez Obrador (also known by his initials, AMLO) and the Morena-dominated legislature to create the reform package that was eventually enacted in June of 2021.⁷ In so doing, Zaldívar, as he stated above, was explicitly attempting to resolve issues of corruption and nepotism within the judiciary while maintaining the judiciary's independence. As a whole, it must be noted, judicial independence helps maintain an independent check on the actions of the executive and legislative branches. In the context of modern Mexican politics, where Morena enjoys much power and AMLO shows some authoritative tendencies,⁸ it is clear what problems of judicial capture Zaldívar must have been alluding to.

The reform, however, was not without controversy. Given Zaldívar's closeness to AMLO in the creation and ultimate passage of the judicial reforms, critics believed (and many continue to believe) that Zaldívar was not acting independently, but was instead controlled by the President.⁹ Furthermore, a late addition to the reform package which would allow Zaldívar's

⁶ Press Release, Supreme Court of Justice of the Nation [SCJN], Palabras del Ministro Presidente, Arturo Zaldívar, Durante el Conversatorio "La Reforma Constitucional al Poder Judicial Federal" Celebrado en Línea por la Facultad de Derecho de la Universidad Nacional Autónoma de México [Words of President Arturo Zaldívar in the Conversation "The Constitutional Reforms to the Federal Judicial Power" with the Law Faculty of the UNAM] (Jan. 21, 2021). (Translated by author)

⁷ Carlos Martín Gómez Marinero, *La Reforma Judicial de 2021 [The Judicial Reforms of 2021]*, 65 HECHOS Y DERECHOS 1, Oct. 12, 2021.

⁸ Mariano Sánchez-Talanquer & Kenneth F. Greene, *Is Mexico Falling into the Authoritarian Trap?*, 32 J DEMOCRACY 56, 56 – 71 (2021) (discussing the erosion of democratic institutions and centralization of power in the executive under President López Obrador).

⁹ Reuters Staff, *Mexico President Defends Supreme Court Chief Justice's Term Extension*, REUTERS (Apr. 26, 2021, 2:21 PM) <https://www.reuters.com/article/us-mexico-politics-court/mexico-president-defends-supreme-court-chief-justices-term-extension-idUSKBN2CD2NS>

presidency over the SCJN to continue for a year beyond its constitutionally mandated limit led to very mixed reviews of the reform, almost all focusing entirely on the extension of Zaldívar's tenure. Although Zaldívar stated after the passage of the law that he would not remain in his seat beyond the constitutional limit, this statement did not come until some time after the public backlash had already occurred.¹⁰ Further, in November 16, 2021, the SCJN sent out a communique in which it announced that the court ruled unanimously that article 13 of the transitory Decree of the Reforms passed in June 7, 2021 (which extended the tenure for both Zaldívar and the sitting members of the CJF) was unconstitutional.¹¹

The reforms were thus motivated by a complex struggle for power between and amongst the judiciary and the presidency. It is unclear what role Zaldívar had on the last-minute addition, but its inclusion in the reform package will forever color any analysis of the motivations for the reform and whether there truly was a blatant attempt to strengthen AMLO's power over the judiciary. At least facially, the impetus for the reform was the corruption, nepotism, and ineffectuality of the judiciary and dissatisfaction with the government generally.

3. Content of Reforms

The reforms that were implemented in 2021 were extensive and detailed, and many of these reforms were substantively thin. As such, this report focuses on a select few of the most important reforms.

¹⁰ Almudena Barragán, *Arturo Zaldívar Renuncia a la Ampliación de su Mandato al Frente de la Suprema Corte* [*Arturo Zaldívar Renounces Extension of his Mandate*], EL PAÍS (Aug. 6, 2021, 11:51 AM), <https://elpais.com/mexico/2021-08-06/zaldivar-renuncia-a-la-ampliacion-de-su-mandato-al-frente-de-la-suprema-corte.html>

¹¹ Press release, Suprema Corte de Justicia de la Nación [SCJN], *La SCJN Invalida el Artículo Transitorio que Amplió el Periodo del Encargo del Presidente del Alto Tribunal y de los Integrantes del Consejo de la Judicatura Federal* [SCJN Invalidates the Law Extending the Mandate of both the President of the High Court and of the Members of the CJF] (Nov. 16, 2021).

First, the reforms include a change to the precedential system (Art. 94 of the Constitution, as amended 11 March, 2021).¹² The Supreme Court remains unable to make binding precedent on lower courts unless it's members have decided, by a vote of at least eight out of eleven (of the full sitting Court) or four of five (of the separate Halls of the Court) to create jurisprudence.¹³ Where in the past, such jurisprudence had to be repeated five times in five distinct cases brought before the SCJN and where each decision reiterated the precedent the court intended to create, now precedent is set with one case decided in the manner previously mentioned. Again, however, the precedential system still requires a “supermajority” of eight judges in a full-sitting court or four judges in the separate chambers to set binding precedents on the lower courts.

Second, Title III of the Organic Law of the Judicial Power of the Federation replaces single-seat appellate courts with multimember appellate courts.¹⁴ This move has been interpreted as perhaps a court-packing gesture, though the stated reasoning for the change is enhancing the appellate courts' ability to handle more cases.¹⁵

Third, the constitutional amendments and implementing statute reform the regime for judicial governance and transform the powers and responsibilities of the judicial school. Article 100, ¶ 7 of the Constitution was amended to establish the Federal School of Judicial Formation (“EFFJ”) as the entity in charge of implementing the processes for the formation, preparation, and actualization of the jurisdictional and administrative personnel of the judicial power, in addition

¹² Constitución Política de los Estados Unidos Mexicanos [Constitution], May 6, 2021, ch. IV, art. 94, par. 12. This and all subsequent amendments explored in this report were enacted on March 11, 2021. The Constitution has been amended a number of times after the Judicial Reforms of 2021, though no such reforms affected the Judiciary per se. The most recent amendments were passed in May of 2021, for which the most up-to-date version of the Constitution is so dated.

¹³ *Id.*

¹⁴ Ley Orgánica del Poder Judicial de la Federación [Organic Law of the Judicial Power of the Federation], Diario Oficial de la Federación [DOF] 07-06-2021 (Mex.), tit. III, art. 25.

¹⁵ Telephone Interview with Dr. José Antonio Caballero Juárez, Professor in the Division of Judicial Studies at the Center of Investigation and Economic Studies, A.C. and Counselor at the Commission of Human Rights at the Federal District of Mexico, (Feb. 22, 2022).

to conducting the contests for judicial placements.¹⁶ The EEFJ is thus given greater latitude in how it conducts the contests for judicial positions in an effort to allow more academic-minded decisionmakers and thus diminish opportunities for nepotism and corruption.

Judicial governance is further reformed in that Art. 100, ¶ 9 was amended to allow the full-sitting SCJN to revise and revoke the CJF's decisions.¹⁷ Paragraph 10 was amended to revoke the finality of the CJF's decisions regarding appointment ratification, and removal of magistrates and judges.¹⁸ Instead, they are narrowly reviewable by the SCJN in verifying that such decisions were constitutional and legal.¹⁹

Fourth, in line with the previous constitutional amendment, Art. 100, ¶ 8 was added to the constitution to professionalize the Public Defender's Office by creating an Institute of the Federal Public Defender ("IDP") which is under the direction of the EFFJ and is charged with preparing public defenders as well as conducting contests for placements in the service.²⁰

Fifth, the reform creates certain statutory points of entry into the judiciary.²¹ Essentially, the statute places certain limitations on the selecting body in order to allow for more selections outside of the judicial elite. Previously, the contests that were held to fill judicial placements tended to solely promote and select from those within the courts. This led to high degrees of nepotism and indeed an insularity where professionals who wanted to serve as judges in the future had to work within the judicial system.²² Now, the statute specifically requires that all

¹⁶ Constitution, ch. IV, art. 100, par. 7.

¹⁷ Constitution, ch. IV, art. 100, par. 9.

¹⁸ Constitution, ch. IV, art. 100, par. 10.

¹⁹ *Id.*

²⁰ Constitution, ch. IV, art. 100, par. 8.

²¹ *See generally*, Ley de Carrera Judicial del Poder Judicial de la Federación [Law of the Judicial Career], DOF 07-06-2021 (Mex.)

²² Telephone Interview with Carlos Martín Gómez Marinero, Author of Manual del Juicio de Amparo [Manual on Bringing Amparo Suits] (Feb. 21, 2022).

contests be open to the legal profession and that selection of candidates must be made from the top 10% of the candidates.²³

Article 20 of the Law of the Judicial Career of the Judicial Power of the Federation thus allows four pathways for entering the judicial profession: (1) participation in open contests for placement which are administered by the EFFJ, (2) open contests for placements of judges and justices of districts, (3) designation in some category of the judicial school pertinent to the SCJN and the Electoral Court, and (4) designation as a secretary for the Circuit Court or as Secretary of a District Court.²⁴ The main aspects of these reforms allow for contests in both the placement of judges and positions within the courts to be made openly, allowing people to enter the profession and rise the ranks outside of internal placements.

Additionally, the EFFJ and CJF are statutorily empowered to use tie-breaking mechanisms in conducting contests for judgeships and other judicial positions by using equity-based criteria such as “parity among genders”.²⁵ The way in which these criteria are to be implemented is not specified in the statute, though such an approach does go hand-in-hand with the general discretion granted to the EFFJ and the CJF in establishing the contests for these positions.

4. Novelty of the Reforms

What is truly “new” about these reforms appears to be the manner in which they were instituted. Judicial reform literature tends to have a bleak outlook on reforms when the political actors enacting them are not incentivized to implement them fully.²⁶ Additionally, the example

²³ Law of the Judicial Career, tit. I, ch. VI, art. 30, par. 1-2.

²⁴ Law of the Judicial Career, tit. I, ch. VI, art. 20.

²⁵ Law of the Judicial Career, tit. I, ch. VI, art. 23, par. 1.

²⁶ Maria Popova & Daniel Beers, *No Revolution of Dignity for Ukraine’s Judges: Judicial Reform after the Euromaidan*, 28 J. POST-SOVIET DEMOCRATIZATION 131-32 (2020) (discussing the political incentives that remained in Ukraine, after the Euromaidan, to continue to politicize instead of insulating the judiciary).

of the Supreme Court in India²⁷ and indeed Justice Marshall’s establishment of judicial review in *Marbury v. Madison* both demonstrate examples where judiciaries take the lead in expanding their own power to limit the power of the other branches of government.²⁸

Here, Zaldívar appears to have gone beyond these examples, spearheading and actively drafting the reforms for the judiciary.²⁹ Though there are doubts about the internal independence of the judiciary,³⁰ the widely undisputed fact remains, that Zaldívar’s actions did stop reforms that would threaten judicial independence.³¹ For example, the proposed reforms of Senator Ricardo Monreal – leader of the Morena party within the Senate – called for the creation of a separate Constitutional Court which would work parallel to the SCJN and be popularly elected.³² This reform was criticized by Mexican legal experts for its clear opportunity for judicial capture and consolidation of control by the Morena party.³³ Indeed, it would appear that the parallel constitutional court would be intended to actually overrule the SCJN, at least in constitutional matters, to the benefit of Morena party policies. Opening the judiciary to such blatant political influence while dividing the most important powers of the judiciary would have enabled AMLO and the Morena party to not only pack the new constitutional court, but also to ensure that the SCJN would be powerless to inhibit the implementation of unconstitutional or authoritarian

²⁷ Raju Ramachandran, *A Case of Self-Selection: Judicial Accountability and Appointment of Judges*, in STATE OF THE INDIAN JUDICIARY: A REPORT BY DAKSH 47(2016) (Discussing the October 2015 Indian Supreme Court decision striking a Constitutional Amendment and NJAC Act and instead upholding its previous practice of self-selection).

²⁸ *Marbury v. Madison*, 5 US (1 Cranch) 137 (1803) (establishing that the Supreme Court of the United States had the power to review the Constitutionality of the Laws of Congress).

²⁹ Telephone Interview with Dr. José Antonio Caballero Juárez (Feb. 22, 2022).

³⁰ Telephone Interview with Carlos Martín Gómez Marinero (Feb. 21, 2022) (“[I]o que no necesariamente positive para la ‘independencia interna’, pues mantiene la revisión administrativa y la facultad de revisar los acuerdos que el Consejo de la Judicatura apruebe.”).

³¹ José Antonio Caballero Juárez, *La Reforma Judicial de 2021: ¿Hacia dónde va la justicia?* [Judicial Reform of 2021: Where is justice going?] 10 (Universidad Nacional Autónoma de México, 1st ed. 2021).

³² Carlos Martín Gómez Marinero, *La Reforma Judicial de 2021* [*The Judicial Reforms of 2021*], 65 HECHOS Y DERECHOS 1, Oct. 12, 2021.

³³ *See, id.*; Caballero Juárez, *supra* note 30.

Morena policies and laws. In this sense, it is important to highlight once more that although the reforms are not groundbreaking, they do maintain the independence of the judiciary while appeasing an authoritarian force in the country.

Although the ultimate reforms may prove to be rehashing thin reforms elsewhere, the fact that the SCJN was able to spearhead its own reforms sets a valuable precedent whereby the Court sets its own rules for how and when it will change its structure.

5. Success of the Reforms

The biggest proponent of the reforms has been, of course, President Zaldívar himself, who has claimed (as noted earlier) that these reforms have been the greatest since those implemented in 1994.³⁴ Further, he has claimed that as a result of the reforms, there are “more and better [female] judges” than ever before.³⁵ Even more so, President Zaldívar has claimed that nepotism is now “totally regulated, the rules are clear” and went as far as to assert, “Today I can say, categorically, that at the level of chief justices of each jurisdiction, nepotism no longer exists in the Federal Judicial Power. There is no longer a single titular judge that has family members working in their jurisdictional organ.”³⁶

However, the reality of the efficacy of the reforms is much less clear. Legal scholars in Mexico have been mostly disinterested or critical of the reforms. Professor at the UNAM, Dr. José Antonio Caballero Juárez, who wrote the only existing book analyzing the 2021 Judicial Reforms in depth, suggests that while the reforms are better than those proposed by members of

³⁴ Arturo Zaldívar (@ArturoZaldivarL), TWITTER (Dec. 14, 2020, 2:21 PM), <https://twitter.com/arturozaldivar/status/1338610108587077633> (“Agradezco a las y los coordinadores y a las y los diputados por su confianza en el #PJF, al aprobar la reforma judicial más trascendente desde 1994...”).

³⁵ Consejo de la Judicatura Federal México, *La Gran Reforma Judicial del Año 2021 [The Great Judicial Reform of 2021]*, YOUTUBE at 42:38-42:52 (Jan. 10, 2022), <https://www.youtube.com/watch?v=7TXfZJg-JkM&t=821s>

³⁶ *Id.* at 42:55-43:18.

congress, “the problem is over and above the ambit of the constitution or the law.”³⁷ Indeed, Dr. Caballero Juarez argues that the goal of combating “nepotism or sexual harassment did not require constitutional changes” and although the reform package includes and identifies “some relevant problems of the federal justice and suggests some adequate solutions,” it falls short of solving them.³⁸ Thus, he argues, “many of the problems, identified or not, that affect the Federal Judicial Power will continue in the short term.”³⁹

Other scholars have reiterated the same sentiments. Professor Gómez Marinero responded, in an inquiry about his recent summary of the reforms for the UNAM’s *Hechos y Derechos* legal journal, that “given the context that preceded the reform, without a doubt, [the 2021 reforms] were a movement anticipating possible changes that would have been a regression” from the advances in judicial independence since 1994.⁴⁰ Similarly, Dr. Caballero Juarez also reiterated his views recently when asked whether the reforms will prove successful: “in the long run, they will not have an impact that is much more notable than the power that already exists. It will instead be very limited in effect.”⁴¹

Non-governmental organizations in Mexico and abroad have seemingly been more skeptical. The latest Americas Quarterly score for Mexico’s capacity to combat corruption decreased to an overall of 4.25 from a previous overall score of 4.55 in 2020.⁴² In that same report, moreover, the individual variable of “Judicial independence and efficiency” remained unchanged from 2019

³⁷ José Antonio Caballero Juárez, *La Reforma Judicial de 2021: ¿Hacia dónde va la justicia? [Judicial Reform of 2021: Where is justice going?]* 132 (Universidad Nacional Autónoma de México, 1st ed. 2021).

³⁸ *Id.* at 135-6.

³⁹ Telephone Interview with Dr. José Antonio Caballero Juárez (Feb. 22, 2022).

⁴⁰ Telephone Interview with Carlos Martín Gómez Marinero (Feb. 21, 2022).

⁴¹ Telephone Interview with Dr. José Antonio Caballero Juárez (Feb. 22, 2022).

⁴² Americas Quarterly, “The Capacity to Combat Corruption (CCC) Index” (2021) https://americasquarterly.org/wp-content/uploads/2021/06/CCC_Report_2021.pdf.

through 2021.⁴³ Similarly, Transparency International’s 2021 score for Mexico maintains no score change from the previous year for Mexico in its Corruption Perception Index with a score of 31/100 which places it near the bottom of all 180 countries ranked.⁴⁴ Human Rights Watch’s (“HRW”) recent 2022 World Report hardly even mentions the 2021 judicial reforms, and only recounted the controversy surrounding the extension of Zaldívar’s term.⁴⁵ HRW flatly maintained, as it did the year prior, that “[t]he justice system regularly fails to ensure due process for those accused of crimes” and that “human rights violations—including torture, enforced disappearances, abuses against migrants, extrajudicial killings, gender-based violence, and attacks on independent journalists and human rights defenders—have continued...”⁴⁶ (However, it is unlikely these reforms would have any effect on these issues in the first place, especially in the short-term). FreedomHouse had a similar approach in their Rule of Law score, giving Mexico a two out of four on the question of whether there is an independent judiciary.⁴⁷ In this scoring, the only statement the organization makes is that the SCJN’s independence is seen as diminished by “a series of appointments of justices viewed as close to the government,” and similar to HRW, only pointed to the last-minute reform add-on of Zaldívar’s extended tenure.⁴⁸

Despite these initial assessments, there do appear to be some advancements that may show that the reforms have been at least somewhat successful in their stated goals. For instance, the CJF in November of 2021 instituted new rules for the observance of contests for judicial positions and included specific provisions allowing for contests that are “exclusively directed at

⁴³ *Id.*

⁴⁴ Transparency International, “Corruption Perceptions Index 2021,” (2022) www.transparency.org/cpi, (last visited Mar. 22, 2022).

⁴⁵ Human Rights Watch, “World Report 2022” (2022).

⁴⁶ *Id.* at 449-50.

⁴⁷ FreedomHouse, “Freedom in the World 2021 – Mexico,” (2022) www.freedomhouse.org/country/mexico/freedom-world/2021 (last visited Mar. 22, 2022).

⁴⁸ *Id.*

women” in order to ensure parity in judicial positions.⁴⁹ Furthermore, the Tenth Title of the same directive, at article 142, specifically outlaws any titular judges and justices from naming or promoting people to any position if they are related to them by blood or marriage.⁵⁰ And it appears that these provisions are actually being implemented as well. On November 27, 2021, the CJF administered a contest exclusively open to women looking to fill positions in the judiciary in ten distinct jurisdictions.⁵¹

Even so, it is unclear how public perceptions of the court have changed and whether or not the court is seen as less corrupt. For instance, though no pollsters have individually asked Mexicans about their perception of the SCJN, CJF, or of Zaldívar individually, recent polls have shown a decrease in the approval ratings for President Lopez Obrador.⁵² Furthermore, Grupo Reforma’s poll, on the question of “how well” respondent’s view the President’s handling of “fighting corruption”, showed a plurality responding that they believe he has acted “poorly” where only 39% of respondents approved of his actions.⁵³

In all, the reforms are still young, and it will be a few years before one can determine whether they have an actual effect—positive or negative—on the independence of the judiciary as a whole. The next few years will be an interesting test of this, as the SCJN approved a referendum that will take place in April 2022 which may lead to President Lopez Obrador

⁴⁹ Acuerdo General del Pleno del Consejo de la Judicatura Federal que Reglamenta la Carrera Judicial [General Decision of the CJF Governing the Judicial Career] DOF 03-11-2021 (Mex.) tit. II, ch. II, art. 19.

⁵⁰ General Decision of the CJF Governing the Judicial Career, tit. X, ch. I, art. 142(I).

⁵¹ Gustavo Castillo, *Emite CJF Convocatoria Exclusiva para Mujeres* [CJF Emits Contest Exclusively for Women], LA JORNADA (Nov. 27, 2021, 6:00 AM), <https://www.jornada.com.mx/notas/2021/11/27/politica/emite-cjf-convocatoria-exclusiva-para-mujeres/>.

⁵² Zisis Carin, *Approval Tracker: Mexico’s President AMLO*, AS/COA (Mar. 3, 2022) <https://www.as-coa.org/articles/approval-tracker-mexicos-president-amlo>.

⁵³ Grupo Reforma, *Encuesta: Baja Aprobación de López Obrador* [Poll: Low Approvals for Lopez Obrador], Grupo Reforma <https://www.reforma.com/baja-aprobacion-de-amlo/gr/vi151757?ap=1>.

extending his tenure.⁵⁴ If he does so, the judiciary does seem to have the tools to stop such a result, though the reality of the situation is yet to be seen.

Motivation: Democracy Promotion | Economic Development | Corruption | Access to Justice

Scope: Thin

Mode: Legislative | Executive | Judiciary | Constitutional Amendment

⁵⁴ Suprema Corte de Justicia de la Nación [SCJN] Dec. 22, 2021, Controversia Constitucional 224/2021 (Mex.).