

---

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS  
RESOLUTION 61/2024**

Precautionary Measure No. 928-24  
Perkins Rocha Contreras regarding Venezuela  
September 2<sup>nd</sup>, 2024  
Original: Spanish

**I. INTRODUCTION**

1. On August 28, 2024, the Inter-American Commission on Human Rights (“the Inter-American Commission”, “the Commission” or “the IACHR”) received a request for precautionary measures filed by Tamara Suju of the CASLA Institute<sup>1</sup> (“the applicants”) urging the Commission to request that the State of Venezuela (“the State” or “Venezuela”) adopt the necessary measures to protect the rights to life and personal integrity of Perkins Rocha Contreras (“the proposed beneficiary”) in Venezuela. According to the request, the proposed beneficiary was arrested on August 27, 2024, by hooded officers without identification. No investigation or search warrant against him is known to exist. To date, his location is unknown.

2. Pursuant to the provisions of Article 25 (5) of its Rules of Procedure and the Inter-American Convention on Forced Disappearance of Persons, the Commission requested information from the parties on August 28, 2024. The applicants submitted a response on August 29, 2024. To date, the IACHR has not received a response from the State and the granted period has expired.

3. Upon analyzing the submissions of fact and law furnished by the applicants, the Commission considers that the proposed beneficiary is in a serious and urgent situation, given that his official location is unknown to date. Therefore, pursuant to the provisions of Article 25 of its Rules of Procedure, the Commission requests that Venezuela: a) adopt the necessary measures to protect the rights to life and personal integrity of Perkins Rocha Contreras. In particular, among others, inform whether the beneficiary is in State custody at the SEBIN headquarters and the circumstances of his detention; specify whether the beneficiary was brought before a competent court to review his detention after having been charged with crimes; or, otherwise, specify the reasons why he has not been released to date; and guarantee the beneficiary’s contact with his family and trusted attorneys, and provide them with the minimum official information on his legal situation; b) implement the necessary measures to ensure that the beneficiary can carry out his activities as a member of an opposition party without facing threats, harassment, or acts of violence; and c) report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.

**II. SUMMARY OF FACTS AND ARGUMENTS**

**A. Information provided by the applicants**

4. Perkins Rocha Contreras is the Legal Coordinator of the *Vente Venezuela* party and representative of the *Comando Venezuela* before the National Electoral Council. He is a lawyer and personal advisor to María Corina Machado (National Coordinator of the *Vente Venezuela* party). The proposed beneficiary is a spokesperson for *Comando Venezuela* in the fraud allegations that the Venezuelan opposition has been making since July 28, 2024. His allegations have been followed by both Venezuelan society and the

---

<sup>1</sup> The applicants attached a handwritten authorization from the proposed beneficiary’s wife to process this request for precautionary measures.

international community. The proposed beneficiary has been giving interviews and daily reports through press conferences to both national and international newspapers, detailing the post-electoral situation in Venezuela.

5. The applicants stated that the proposed beneficiary was arrested on August 27, 2024 at around 12:15 p.m. in a pharmacy located at Av. Principal de las Mercedes, in Caracas, where he was buying supplies. According to information obtained by the family through social networks, 10 officers in several vans reportedly arrived at the scene. After a physical struggle with the proposed beneficiary, they reportedly took him. At that moment, Perkins Rocha reportedly shouted his name. The officials were hooded and armed. The proposed beneficiary's wife received a phone call from her son, who informed her about what was being published on social networks. She tried to contact her husband but was unsuccessful. From that moment on, the whereabouts of the proposed beneficiary have been unknown. The security agents allegedly took him away using physical violence and without an arrest warrant.

6. During the night of August 27, 2024, unidentified individuals broke into the apartment where the proposed beneficiary resides. No search warrant is known to exist. They reportedly took electronic equipment, books, documents, writings, and computers from the apartment. His family members consider this an "invasion" and theft, as the intruders appeared to have used Mr. Perkins Rocha's keys to gain entry. The applicants believe that when the proposed beneficiary was arrested, the officers seized his car and gained access to the keys for the apartment.

7. On August 28, 2024, the proposed beneficiary's wife, along with his attorney, went to the headquarters of the Bolivarian National Intelligence Service (SEBIN) located in the Helicoide in Caracas as it was allegedly reported on social media that the proposed beneficiary had been transferred there. SEBIN officials stated that, by higher orders, they are prohibited from disclosing any information about whether missing or detained individuals are in their custody starting from August 27, 2024. Subsequently, the proposed beneficiary's wife and his attorney went to the headquarters of the Bolivarian National Police, where they were reportedly informed that the proposed beneficiary was not being held there. The wife reported that on August 29, 2024, she planned to go to the Office of the Attorney General and the Ombudsperson's Office to denounce the proposed beneficiary's detention and that she was going to file a *writ of habeas corpus* before the Courts of Caracas.

8. Lastly, they pointed out that, to date, the proposed beneficiary's family members and attorney still do not have any information on his whereabouts. There is also no information regarding which security agency took him or his current physical condition. Although the proposed beneficiary is the legal spokesman for the opposition, to date, no representative of the Venezuelan government has commented on his case. The applicants described the situation as a "kidnapping" and a "forced disappearance."

#### **B. Response from the State**

9. The IACHR requested information from the State on August 28, 2024. To date, the State has not sent a response, and the granted period has expired.

#### **III. ANALYSIS OF THE ELEMENTS OF SERIOUSNESS, URGENCY, AND IRREPARABLE HARM**

10. The mechanism of precautionary measures is part of the Commission's function of overseeing compliance with the human rights obligations set forth in Article 106 of the Charter of the Organization of American States. These general oversight functions are provided for in Article 41(b) of the American Convention on Human Rights, as well as in Article 18(b) of the IACHR Statute. The mechanism of precautionary measures is set forth in Article 25 of the Commission's Rules of Procedure. In accordance with that Article, the Commission grants precautionary measures in serious and urgent situations in which these measures are necessary to avoid an irreparable harm to persons.

11. The Inter-American Commission and the Inter-American Court of Human Rights (“the Inter-American Court” or “I/A Court H.R.”) have repeatedly stated that precautionary and provisional measures have a dual nature, one protective and the other precautionary.<sup>2</sup> Regarding the protective nature, these measures seek to avoid irreparable harm and preserve the exercise of human rights.<sup>3</sup> To do this, the IACHR shall assess the problem raised, the effectiveness of state actions to address the situation described, and how vulnerable the persons proposed as beneficiaries would be left in case the measures are not adopted.<sup>4</sup> Regarding their precautionary nature, these measures have the purpose of preserving legal situations while under the study of the IACHR. They aim to safeguard the rights at risk until the petition pending before the inter-American system is resolved. Their object and purpose are to ensure the integrity and effectiveness of an eventual decision on the merits and, in this way, avoid any further infringement of the rights at issue, a situation that may adversely affect the useful effect (*effet utile*) of the final decision. In this regard, precautionary or provisional measures allow the State concerned to comply with the final decision and, if necessary, implement the ordered reparations.<sup>5</sup> In the process of reaching a decision, according to Article 25(2) of its Rules of Procedure, the Commission considers that:

- a. “serious situation” refers to a grave impact that an action or omission can have on a protected right or on the eventual effect of a pending decision in a case or petition before the organs of the inter-American system;
- b. “urgent situation” refers to risk or threat that is imminent and can materialize, thus requiring immediate preventive or protective action; and
- c. “irreparable harm” refers to injury to rights which, due to their nature, would not be susceptible to reparation, restoration or adequate compensation.

12. In analyzing those requirements, the Commission reiterates that the facts supporting a request for precautionary measures need not be proven beyond doubt. The information provided should be assessed from a *prima facie* standard of review to determine whether a serious and urgent situation exists.<sup>6</sup> Similarly, the Commission recalls that, by its own mandate, it is not called upon to determine any individual liabilities for the facts alleged. Moreover, in this proceeding, it is not appropriate to rule on violations of rights enshrined in the American Convention or other applicable instruments.<sup>7</sup> This is better suited to be addressed by the Petition

<sup>2</sup> I/A Court H.R., [Matter of the Yare I and Yare II Capital Region Penitentiary Center](#), Provisional Measures regarding the Bolivarian Republic of Venezuela, Order of March 30, 2006, considerandum 5; *Case of Carpio Nicolle et al. v. Guatemala*, Provisional Measures, Order of July 6, 2009, considerandum 16 (Available only in Spanish).

<sup>3</sup> I/A Court H.R., [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#), Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 8; [Case of Bámaca Velásquez](#), Provisional Measures regarding Guatemala, Order of January 27, 2009, considerandum 45; [Matter of Fernández Ortega et al.](#), Provisional Measures regarding Mexico, Order of April 30, 2009, considerandum 5; [Matter of Milagro Sala](#), Provisional Measures regarding Argentina, Order of November 23, 2017, considerandum 5. (Available only in Spanish)

<sup>4</sup> I/A Court H.R., [Matter of Milagro Sala](#), Provisional Measures regarding Argentina, Order of November 23, 2017, considerandum 5 (Available only in Spanish); [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#), Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 9; [Matter of the Criminal Institute of Plácido de Sá Carvalho](#), Provisional Measures regarding Brazil, Order of February 13, 2017, considerandum 6 (Available only in Spanish).

<sup>5</sup> I/A Court H.R., [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#), Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 7; [Matter of “El Nacional” and “Así es la Noticia” newspapers](#), Provisional Measures regarding Venezuela, Order of November 25, 2008, considerandum 23; [Matter of Luis Uzcátegui](#), Provisional Measures regarding Venezuela, Order of January 27, 2009, considerandum 19 (Available only in Spanish).

<sup>6</sup> I/A Court H.R., [Matter of Members of the Miskitu Indigenous Peoples of the North Caribbean Coast regarding Nicaragua](#), Extension of Provisional Measures, Order of August 23, 2018, considerandum 13 (Available only in Spanish); [Matter of children and adolescents deprived of liberty in the “Complexo do Tatuapé” of the Fundação CASA](#), Provisional Measures regarding Brazil, Order of July 4, 2006, considerandum 23.

<sup>7</sup> IACHR, [Resolution 2/2015](#), Precautionary Measure No. 455-13, Matter of Nestora Salgado regarding Mexico, January 28, 2015, para. 14; [Resolution 37/2021](#), Precautionary Measure No. 96-21, Gustavo Adolfo Mendoza Beteta and family regarding Nicaragua, April 30, 2021, para. 33.

and Case system. The following analysis refers exclusively to the requirements of Article 25 of its Rules of Procedure, which can be resolved without entering into determinations on the merits.<sup>8</sup>

13. In this sense, in understanding the facts alleged by the applicants, the Commission observes that the Inter-American Convention on Forced Disappearance of Persons, to which the State of Venezuela has been annexed since its ratification on July 6, 1998,<sup>9</sup> considers forced disappearance as the act “[...] perpetrated by agents of the state or by persons or groups of persons acting with the authorization, support, or acquiescence of the state, followed by an absence of information or a refusal to acknowledge that deprivation of freedom or to give information on the whereabouts of that person, thereby impeding his or her recourse to the applicable legal remedies and procedural guarantees.”<sup>10</sup> In addition, the Inter-American Commission also highlights what was established by the United Nations Working Group on Enforced or Involuntary Disappearances, in the sense that “there is no time limit, no matter how short, for an enforced disappearance to occur.”<sup>11</sup>

14. In this *context*, the Commission has been monitoring the rule of law and human rights situation in Venezuela since 2005 and has included the country in Chapter IV. B of its Annual Report since 2005.<sup>12</sup> The Commission has also issued press releases and country reports, and established the Special Follow-up Mechanism for the Country, known as MESEVE. In addition, in its 2021 Annual Report, the Commission stated that temporary forced disappearances have been systematically practiced in Venezuela, mainly against persons perceived as opponents.<sup>13</sup> These occur mostly due to the deliberate reluctance of the authorities to report the whereabouts of detained persons, as well as not bringing persons before the courts within the legal 48-hour period after detention.<sup>14</sup> In various testimonies collected by the IACHR, there is the suggestion that temporary forced disappearances are a tool of political repression in Venezuela.<sup>15</sup>

15. In its 2023 Annual Report, the Commission also observed the persistence of a coordinated repression policy, and recommended that the State of Venezuela refrain from carrying out illegal or arbitrary detentions. In cases where a person is deprived of their liberty, the State should ensure that all due process guarantees are upheld, including prompt presentation before an independent judicial authority, in order to prevent enforced disappearances, torture, and other cruel and inhumane treatment.<sup>16</sup> The Commission has recently condemned the practices of institutional violence in the context of the electoral process in Venezuela, including violent repression, arbitrary detentions, and political persecution.<sup>17</sup> In addition, the Commission has noted the arbitrary detentions and forced disappearances that occurred between July 28 and August 13, 2024.<sup>18</sup> The strategy of detention and criminalization appears to be specifically targeted at individuals perceived as opponents of the regime, including journalists, opposition leaders, human rights defenders, and others.<sup>19</sup> Similarly, the Office of the Special Rapporteur for Freedom of Expression of the IACHR emphasizes that, in Venezuela, the right to freedom of expression continues to be severely limited. This is the result of a context of

---

<sup>8</sup> In this regard, the Court has stated that “[it] cannot, in a provisional measure, consider the merits of any arguments pertaining to issues other than those which relate strictly to the extreme gravity and urgency and the necessity to avoid irreparable damage to persons.” I/A Court H.R., [Matter of James et al. regarding Trinidad and Tobago](#), Provisional Measures, Order of August 29, 1998, considerandum 6 (Available only in Spanish); [Case of the Barrios Family v. Venezuela](#), Provisional Measures, Order of April 22, 2021, considerandum 2 (Available only in Spanish).

<sup>9</sup> [Inter-American Convention on Forced Disappearance of Persons](#), Belém do Pará, Brazil, June 9, 1994, [Signatories and current status of ratifications of the Inter-American Convention on Forced Disappearance of Persons](#).

<sup>10</sup> [Inter-American Convention on Enforced Disappearance of Persons](#), Belém do Pará, Brazil, June 9, 1994.

<sup>11</sup> IACHR, [2021 Annual Report, Ch. IV.B. Venezuela](#), OEA/Ser.L/V/II, approved on May 26, 2022, para. 85; United Nations Human Rights Council, Report of the Working Group on Enforced or Involuntary Disappearances, August 10, 2015, A/HRC/30/38, para. 102.

<sup>12</sup> IACHR, [2023 Annual Report, Ch. IV.B. Venezuela](#), OEA/Ser.L/V/II. Doc. 386 rev. 1, approved on December 31, 2023, para. 1.

<sup>13</sup> IACHR, [2021 Annual Report, Ch. IV.B. Venezuela](#), OEA/Ser.L/V/II, approved on May 26, 2022, para. 82.

<sup>14</sup> *Ibidem*, para. 82

<sup>15</sup> IACHR, [2021 Annual Report, Ch. IV.B. Venezuela](#), OEA/Ser.L/V/II, approved on May 26, 2022, para. 84.

<sup>16</sup> IACHR, [2023 Annual Report, Ch. IV.B. Venezuela](#), OEA/Ser.L/V/II. Doc. 386 rev. 1, approved on December 31, 2023, Recommendation 8.

<sup>17</sup> IACHR, Press Release 184/24, [IACHR and RELES Condemn State Terrorism Practices in Venezuela](#), August 15, 2024.

<sup>18</sup> *Ibidem*

<sup>19</sup> *Ibidem*

intimidation, harassment, repression, and stigmatization of journalists, human rights defenders, and other critical voices by the government.<sup>20</sup>

16. On August 15, 2024, the IACHR and its Office of the Special Rapporteur for Freedom of Expression (RELE) condemned practices of State terrorism in Venezuela, including violent repression, arbitrary detentions and political persecution.<sup>21</sup> It was stated that the current regime is using fear as a tool to silence citizens and maintain its authoritarian rule, and that Venezuela must immediately stop violating human rights and restore democratic order and the rule of law.<sup>22</sup> In this context, the Commission has received reports of arbitrary detentions and short-term forced disappearances, during which acts of sexual violence against women and other actions potentially amounting to torture were allegedly committed. These reports indicate selective deprivation of liberty targeting electoral volunteers and those perceived as opponents of the regime, including journalists, opposition leaders, human rights defenders, and university students.<sup>23</sup> Additionally, it was found that detainees were subjected to criminal proceedings for crimes defined in ambiguous and broad terms, without the opportunity to be represented by a defense counsel of their choice, as public defenders were imposed on them. The IACHR stressed that “the practices of state terrorism perpetrated by the current regime and observed by the Commission are not only aimed at the persecution of specific sectors, but also generate a climate of fear and intimidation among the Venezuelan population,” which “amount also to a denial of the right to political participation.”<sup>24</sup>

17. The Commission considers that the identified context is crucial for contributing seriousness to the factual allegations concerning the current and specific situation that the proposed beneficiary faces. Consequently, the Commission understands that, given the consistency of the allegations within the identified context, he may be in a situation of exceptional vulnerability due to his prominent role in legally defending the fraud allegations made by the opposition in Venezuela.

18. When reviewing the *seriousness* requirement, the Commission first highlights the proposed beneficiary’s role as lawyer and principal advisor to María Corina Machado, who currently has precautionary measures in her favor.<sup>25</sup> Both the proposed beneficiary and Ms. Machado are members and coordinators of the *Vente Venezuela* Party. In addition, the proposed beneficiary was appointed as the representative to the National Electoral Council for the July 2024 presidential elections. Following that date, the proposed beneficiary has been a prominent figure in denouncing fraud to both the Venezuelan public and the international community.

19. Secondly, the Commission observes that the official whereabouts of the proposed beneficiary have been unknown since his detention on August 27, 2024. He was reportedly confronted by 10 armed and hooded officials, and the specific state security agency involved has not been identified. That same day, his apartment was reportedly broken into by unidentified persons, who may have had access to the house key at the time of the arrest.

20. Thirdly, the Commission understands that the proposed beneficiary was detained without basic guarantees, such as knowledge of a criminal investigation against him, the existence of an arrest or search warrant, judicial review by a competent authority, or official information about the detention facility to which he was being transferred. These actions are consistent with the context that the Commission has been

---

<sup>20</sup> IACHR, [2023 Annual Report, Volume II, Report of the Office of the Special Rapporteur for Freedom of Expression](#), OEA/Ser.L/V/II, Doc. 386, approved on December 6, 2023, para. 1621.

<sup>21</sup> IACHR, Press Release 184/24, [IACHR and SRFOE condemn State terrorism practices in Venezuela](#), August 15, 2024.

<sup>22</sup> *Ibidem*.

<sup>23</sup> *Ibidem*.

<sup>24</sup> *Ibidem*.

<sup>25</sup> IACHR, [Resolution 22/2019](#), Precautionary Measure No. 125-19, María Corina Machado Parisca, regarding Venezuela, April 12, 2019 (Only available on Spanish); and [Resolution 79/2023 \(Follow-up\)](#), Precautionary Measure No. 125-19, María Corina Machado Parisca, regarding Venezuela, December 19, 2023.



identifying. In addition, the Commission understands that his personal attorney and family members have reportedly not received any official information on the proposed beneficiary's legal status following his arrest. The applicants also alleged that the Venezuelan government has not made any public statement, despite the proposed beneficiary's prominent role within the opposition and his close association with Ms. Machado.

21. Fourth, the Commission finds that the search for the proposed beneficiary, carried out by his family and attorney, has been unsuccessful. Despite having visited the SEBIN and the National Bolivarian Police headquarters, no official response has been obtained regarding Mr. Perkins Rocha's whereabouts or his detention conditions. The Commission highlights that SEBIN officials refuse to provide information on the proposed beneficiary, reportedly in compliance with superior orders.

22. Fifth, from publicly available information, the Commission observes that the proposed beneficiary's wife was informed via a message that he had been charged with the crimes of terrorism, treason, conspiracy, criminal association, and incitement to hatred.<sup>26</sup> He is reported to have been presented at a hearing with a public defender, and was not given the opportunity to opt for private legal representation.<sup>27</sup> Public information reveals that the proposed beneficiary was allegedly held at SEBIN headquarters,<sup>28</sup> where officials had previously refused to provide his wife information on him. The proposed beneficiary's wife continues to express frustration over the lack of official information regarding his situation. Both his lawyer and his family continue to be denied access to the proposed beneficiary.<sup>29</sup>

23. In this context, the Commission highlights that, given the detention and the lack of official information about the proposed beneficiary's whereabouts, he is being effectively removed from the public debate in Venezuela. This prevents him from continuing to provide statements as a critical and highly visible voice within the opposition. Consequently, the Commission emphasizes its concern about the potentially intimidating effect that this situation may have on others within the opposition in Venezuela, especially in the post-electoral context. The Commission observes that the situation that the proposed beneficiary faces is part of a series of detentions of opposition figures, whose official whereabouts remain unknown to date. This has led to the granting of precautionary measures in the current context. For example, a state coordinator of María Corina Machado's campaign command,<sup>30</sup> opposition political leaders,<sup>31</sup> journalists with family members in opposition parties,<sup>32</sup> and electoral observers.<sup>33</sup>

24. In this regard, the Commission recalls that, according to international human rights standards, the State is obligated to maintain an updated record of detentions, promptly provide information about the person's whereabouts and health, and, if the person is in State custody, present them before a competent judicial authority within legal timeframes while fully respecting judicial guarantees at all time.<sup>34</sup> The IACHR

---

<sup>26</sup> EL ESPECTADOR, [Perkins Rocha, Machado's lawyer, charged with "terrorism" and "treason"](#), August 30, 2024; DIARIO LAS AMÉRICAS, [Lawyer for the opposition leader María Corina Machado charged with five crimes](#), August 29, 2024; EFECTO COCUYO [Prosecutor's Office accuses Perkins Rocha of terrorism, treason, and incitement to hatred](#), August 29, 2024.

<sup>27</sup> *Ibidem*.

<sup>28</sup> *Ibidem*.

<sup>29</sup> *Ibidem*.

<sup>30</sup> IACHR, [Resolution 46/2024](#), Precautionary Measures No. 862-24, María Andreina Oropeza regarding Venezuela, August 10, 2024.

<sup>31</sup> IACHR, [Resolution 49/2024 \(Monitoring and Modification\)](#), Precautionary Measure No. 533-17, Williams Daniel Dávila Barrios, regarding Venezuela, August 14, 2024; [Resolution 50/2024](#), Precautionary Measure No. 883-24, Roland Oswaldo Carreño Gutiérrez, regarding Venezuela, August 17, 2024; [Resolution 51/2024 \(Monitoring and Modification\)](#), Precautionary Measure No. 359-16, Américo de Grazia regarding Venezuela, August 17, 2024; [Resolution 55/2024](#), Precautionary Measure No. 899-24, Freddy Francisco Superlano Salinas regarding Venezuela, August 26, 2024, (Only available in Spanish).

<sup>32</sup> IACHR, [Resolution 58/2024](#), Precautionary Measures No. 907-24, Ana Carolina Guaita Barreto regarding Venezuela, August 27, 2024.

<sup>33</sup> IACHR, [Resolution 54/2024](#), Precautionary Measures No. 900-24, Carmen Leonor García Azuaje regarding Venezuela, August 23, 2024.

<sup>34</sup> IACHR, [2021 Annual Report, Ch. IV.B. Venezuela](#), OEA/Ser.L/V/II, approved on May 26, 2022, para. 86.

---

also highlights that every detained person has the right to maintain personal and direct contact, through periodic visits, with family members, legal representatives, and other persons.<sup>35</sup>

25. In the same vein and in view of the allegations presented by the applicants, the Commission regrets the lack of response from the State of Venezuela. Although this is not enough per se to justify the granting of a precautionary measure, it does prevent the Commission from obtaining information that allows it to contrast the allegations made by the applicants. Similarly, the Commission is unable to determine the actions that authorities may be taking to address or mitigate the risk situation faced by the proposed beneficiary, particularly given the circumstances under which his detention is alleged to have occurred.

26. In addition, the Commission understands that, given the lack of minimal information on the legal situation of the proposed beneficiary, the family members face serious restrictions in seeking protection from the judicial authorities. However, the Commission notes that the family has indicated they will file internal appeals with certain authorities, despite lacking any minimal official information that enables them to adequately defend his rights. In this regard, the Commission considers that given the lack of official information, in addition to the fact that his location or official whereabouts are unknown, the proposed beneficiary faces an extraordinary lack of protection.

27. In summary, the Commission observes that, in light of previous assessments, the post-electoral context in Venezuela, and the applicable *prima facie* standard, it is evident that Perkins Rocha's rights to life and personal integrity are at serious risk due to the current lack of official information about his whereabouts after allegedly being detained by state agents on August 27, 2024, in Caracas.

28. With regard to the requirement of *urgency*, the Commission also notes that it has been fulfilled, given that the proposed beneficiary's current whereabouts are unknown, and given that the facts described suggest that the risk is likely to continue and to be exacerbated over time. Therefore, the Commission considers it necessary to adopt immediate measures to safeguard the rights of the proposed beneficiary.

29. Regarding the requirement of *irreparable harm*, the Commission maintains that it has been met since the potential impact on the rights to life and personal integrity constitutes the maximum situation of irreparability.

#### **IV. BENEFICIARY**

30. The Commission declares Perkins Rocha Contreras as the beneficiary of the precautionary measures, who is duly identified in this proceeding.

#### **V. DECISION**

31. The Commission understands that this matter meets *prima facie* the requirements of seriousness, urgency, and irreparable harm set forth in Article 25 of its Rules of Procedure. Consequently, the Commission requires that Venezuela:

- a) adopt the necessary measures to protect the rights to life and personal integrity of Perkins Rocha Contreras. In particular, among others, inform whether the beneficiary is in State custody at the SEBIN headquarters and the circumstances of his detention; specify whether the beneficiary was brought before a competent court to review his detention after having been charged with crimes; or, otherwise, specify the reasons why he has not been released to date;

---

<sup>35</sup> IACHR, [Principles and Good Practices on the Protection of Persons Deprived of Liberty in the Americas](#), adopted by the Commission during the 131st regular Period of Sessions, held from March 3 to 14, 2008, Principle XVIII.

and guarantee the beneficiary's contact with his family and trusted attorneys, and provide them with the minimum official information on his legal situation;

b) implement the necessary measures to ensure that the beneficiary can carry out his activities as a member of an opposition party without facing threats, harassment, or acts of violence; and

c) report on the actions taken to investigate the alleged events that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.

32. The Commission requests that Venezuela report, within 15 days from the date of notification of this resolution, on the adoption of the requested precautionary measures and update that information periodically.

33. The Commission emphasizes that, in accordance with Article 25(8) of its Rules of Procedure, the granting of this precautionary measure and its adoption by the State do not constitute a prejudgment of any violation of the rights protected in the American Convention and other applicable instruments.

34. The Commission instructs its Executive Secretariat to notify this resolution to the State of Venezuela and the applicants.

35. Approved on September 2, 2024, by Roberta Clarke, President; Carlos Bernal Pulido, First Vice President; José Luis Caballero Ochoa, Second Vice President; Edgar Stuardo Ralón Orellana; Arif Bulkan; Andrea Pochak, and Gloria Monique de Mees, members of the IACHR.

Tania Reneaum Panszi  
Executive Secretary