
**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION TO LIFT PRECAUTIONARY MEASURES 18/2025**

Precautionary Measure No. 113-07

Luis Fernando Quijano and eleven other persons regarding Colombia¹

February 24, 2025

Original: Spanish

I. SUMMARY

1. The Inter-American Commission on Human Rights (IACHR) decided to lift these precautionary measures in favor of twelve persons identified as members of the Corporation for Peace and Social Development (CORPADES). The Commission evaluated the actions taken by the State during implementation as well as the observations of the beneficiaries' representation. Based on several requests for information, the Commission understands that the circumstances for which the precautionary measures were granted have changed significantly. In this regard, taking into account the nature of the precautionary measures mechanism and in light of the information available, the Commission considered that it did not have the elements to find that the requirements of Article 25 of its Rules of Procedure were met. Consequently, the IACHR decided to lift these precautionary measures.

II. BACKGROUND INFORMATION

2. On March 14, 2008, the IACHR granted precautionary measures in favor of (1) Luis Fernando Quijano, (2) Carlos Mario Arenas, (3) Teresa Muñoz Lopera, (4) Alberto Mazo Monsalve, (5) Dillier Fernando Vásquez Rúa, (6) Santiago Quijano, and (7) Martín Alonso Velásquez, members of the Corporation for Peace and Social Development (CORPADES). It was alleged that the beneficiaries were targets of threats and attacks allegedly committed by illegal groups. In view of the situation, the Commission requested that the State adopt the necessary measures to guarantee the life and physical integrity of the beneficiaries, and report on the actions taken to investigate judicially the facts that led to the adoption of these precautionary measures.²

3. On January 14, 2010, the IACHR extended the precautionary measures in favor of (8) Guillermo Osorio, (9) Jairo Iván Maya Rodríguez, (10) Yeisme Romero Fuenmayor, (11) Juan David Muñoz, and (12) Rafael Emiro Bedoya, all members of the Corporation for Peace and Social Development (CORPADES), in Colombia. It was alleged that the beneficiaries were also subjected to threats by alleged paramilitary groups as a result of their community leadership and participation in criminal proceedings against members of illegal organizations. In addition, it was reported that, on December 20, 2009, John Alexander Pulgarín, a member of CORPADES and a witness in a trial against a paramilitary, was killed.³

4. The *Corporación Jurídica Libertad* (CJL) exercises representation before the Commission.

III. INFORMATION PROVIDED DURING THE TIME THESE PRECAUTIONARY MEASURES WERE IN FORCE

¹ In accordance with Article 17(2) of the Rules of Procedure of the IACHR, Commissioner Carlos Bernal Pulido, a Colombian national, did not participate in the debate and deliberation of this matter.

² IACHR, [Precautionary Measures 2008](#), Precautionary Measures granted by the IACHR in 2008, Colombia, PM 113/07 Corporación para la Paz y el Desarrollo Social (CORPADES), para. 11.

³ IACHR, [2010 Annual Report, Chapter III, C. 1](#), Precautionary Measures granted by the IACHR, Extension PM 113-07 – Corporación para la Paz y el Desarrollo Social (CORPADES), Colombia, para. 13.

5. During the time the measures were in force, the Commission sent requests for information to both parties, and held three working meetings⁴ and a thematic hearing.⁵ In an attempt to analyzing the current situation of the beneficiaries, the Commission will focus on the communications received in recent years on the following dates:

	Reports from the State	Communications by the representation	IACHR
2010	July 14, December 15 and 27	April 26, June 7, December 2 and 15	June 11, December 9 and 22
2011	May 23	January 24, March 20, April 1 and 6	April 14
2012	March 6, April 3 and 30	February 9, May 22 and 31	January 10, February 23, April 2 and 17, and December 20
2013	April 16, June 14, July 30	February 1 and December 17	March 4, June 7 and September 24
2014	January 27, September 18	January 20, June 27, August 1, November 19	February 6 and 26, March 5, August 7, and October 16
2015	No communications	October 22	No communications
2016	February 25, July 19	June 14	April 22 and June 16
2017	No communications	August 22, September 8, November 22	May 1
2018	April 30	February 1	April 11
2020	August 26	December 14	November 3
2022	September 5	No communications	June 5 and October 24
2023	No communications	No communications	December 22
2024	April 24, July 12, August 14	May 31, July 3 and 10	April 4, June 3, and July 17

6. On December 22, 2023, the Commission requested information from the representation in order to evaluate keeping the precautionary measures in force. The request was reiterated on April 4, 2024. On June 3, 2024, the representation was requested to provide specific and detailed information regarding each of the beneficiaries. However, no individualized information was submitted on the beneficiaries.

A. Information provided by the State

7. On March 28, 2010, after a meeting of the Committee on Regulation and Risk Assessment (CRER), it was recommended to extend the ground transportation support measure in favor of Santiago Quijano, Martín Alonso Velásquez, and Dillier Fernando Vásquez. The State implemented police magazines at the home of Luis Fernando Quijano. In addition, the State shared with him safety and self-protection recommendations, and reinforced his protection detail consisting of four security escorts equipped with four weapons, two means of communication, an armored vehicle, and residential armor. On June 25, 2010, a follow-up and consultation meeting was held.

8. In 2011, the State held follow-up and consultation meetings on February 4 and May 9, 2011. Regarding the investigation into the murder of John Alexander Pulgarín, it was reported that the person identified as one of the alleged perpetrators pleaded guilty to the existing charges.⁶ According to Colombia,

⁴ Work Meeting within the framework of the 137th Period of Sessions, November 4, 2009; Work Meeting within the framework of the 141st Period of Sessions, March 26, 2011; and Work Meeting within the framework of the 150th Period of Sessions, March 26, 2014.

⁵ IACHR, 185th Period of Sessions, [Hearing No. 15. Implementation of precautionary measures for human rights defenders in Colombia](#), October 27, 2022.

⁶ Charges of aggravated homicide; attempted aggravated homicide; manufacture, trafficking and/or carrying of firearms for the exclusive use of the Military Forces.

there were allegedly other individuals waiting for the arrest warrants. On March 13, 2012, the Committee for Risk Assessment and Recommendation of Measures (CERREM) recommended extending the protection details of Luis Fernando Quijano, Santiago Quijano, and Carlos Mario Arenas. In addition, a Technical Risk Level Study was requested from Martín Alonso Velásquez. The State stressed that in recent months no risk events were reported against the members of CORPADES.

9. The State held a new follow-up and consultation meeting on September 14, 2012. In accordance with the meeting, a self-protection and personal security manual was delivered to Jairo Iván Maya Rodríguez. It was indicated that Luis Fernando Quijano enjoyed a protection detail made up of seven security escorts, a fixed position in his residence, media, bulletproof vest, and police inspections at his home. In addition, armor, police magazines and a fixed security post were implemented at the headquarters of CORPADES, and a fixed post in a property owned by the Corporation. In 2013, it was announced that there were two investigations, one for threats and another for a crime established against Luis Fernando Quijano. The investigations into the murders of Víctor Hugo Gallego Arboleda and Rubén Darío Palacio Gómez, security escorts of Carlos Mario Arenas, were also described.

10. In 2014, the State reported additional consultation meetings on November 15 and December 9, 2013. On December 13, 2013, the National Protection Unit (UNP) requested a risk assessment regarding Jairo Iván Maya Rodríguez, Martín Alonso Velásquez, Yeisme Romero Fuenmayor, Guillermo Osorio, and Rafael Emiro Bedoya. At that date, it was asserted that Luis Fernando Quijano had a security detail consisting of two police escorts with weapons and perimeter security at his home. The State held another consultation meeting on May 14, 2015. In 2016, the State detailed the payments made for support to Martín Alonso Velásquez, Yeisme Romero Fuenmayor, Rafael Emiro Bedoya, Juan David Muñoz, and Jairo Iván Maya Rodríguez. Between 2015 and 2016, risk level assessments were carried out on Juan David Muñoz, Carlos Mario Arenas, and Martín Alonso Velásquez. On May 20, 2016, the security teams were maintained at the headquarters of CORPADES and the address of Luis Fernando Quijano.

11. In 2018, it was informed that a follow-up and consultation meeting was held on September 5, 2017. It was reported that the National Police established a fixed post at the headquarters of CORPADES and carried out patrols and rounds at the home of Luis Fernando Quijano. The protection details implemented were:

- Carlos Mario Arenas with extraordinary risk determined on February 21, 2017. He was assigned a conventional vehicle and two protection men.
- Luis Fernando Quijano with extraordinary risk determined on September 29, 2017. He was assigned an armored vehicle, a conventional vehicle, five protection men, a means of communication, and an armored vest.
- Martín Alonso Velásquez with extraordinary risk. He was assigned a support button, a means of communication, an armored vest, and a protection man.
- Alberto Mazo Monsalve with extraordinary risk. He was assigned a conventional vehicle, two security men, a means of communication, and a bulletproof vest.
- Santiago Quijano with extraordinary risk. He was assigned a protection detail consisting of a conventional vehicle, two protection men, a means of communication, and a bulletproof vest.
- Guillermo Osorio, Jairo Iván Maya Rodríguez, Juan David Muñoz, Yeisme Romero Fuenmayor, and Rafael Emiro Bedoya with an ordinary risk. No measures have been designated in their favor.

12. In 2020, the Office of the Attorney General indicated that Luis Fernando Quijano appeared as a victim in 15 investigations for acts between 2007 and 2019. In 2022, the State reported that it held a follow-up and consultation meeting on June 3, 2022, continuing with the implementation of the measures. In 2024, the State reported that there were two active investigations for the crime of threats. Finally, a follow-up and consultation meeting of the measures was held on June 8, 2023. On the other hand, it was announced that the beneficiaries of the precautionary measure have refused the implementation of preventive measures by the National Police.

B. Information provided by the representation

13. In 2010, the representation referred to the conciliation meetings on November 20, 2009, and June 25, 2010. On November 8 and 12, 2010, there was reportedly knowledge of a plan to assassinate Mr. Quijano. In the months of October and November, follow-ups were observed on motorcycles and vehicles on the trips and places where Luis Fernando Quijano was. On December 11, 2010, the beneficiary was allegedly pursued by three men in Medellín. Mr. Quijano possessed protection measures consisting of police rounds, four security escorts, armored vehicle, communication radios, bulletproof vest, and residential armor. The representation considered that the measures were not sufficient. On December 30, 2010, Ms. Ana Milena Oquendo Roldán, wife of Mr. Alberto Mazo Monsalve, and his daughter (a minor), were victims of an attempted kidnapping. Between April 1 and 2, 2011, subjects of a suspicious attitude were around the headquarters of CORPADES taking photographs.

14. In 2012, the representation considered that the protection measures were not suitable. Similarly, the murder of two security escorts of the beneficiary Carlos Mario Arenas was reported, one in March 2011 and the other on May 28, 2012, in front of his home. Meetings were held on November 15 and December 9, 2013.

15. In 2014, it was reported that a consultation meeting on measures was held on April 25, 2014. After this, the material transport support measure was resumed in favor of Jairo Iván Maya Rodríguez, Guillermo Osorio, Juan David Muñoz, Rafael Emiro Bedoya, Martín Alonso Velásquez, and Yeisme Romero Fuenmayor. In addition, a temporary relocation provision was approved for Juan David Muñoz and Jairon Iván Maya. The support payments were reportedly not regularly provided. Likewise, there were supposed inconsistencies at the fixed police post at the headquarters of CORPADES. On June 21 and 24, 2014, the representation learned of a plan to assassinate Luis Fernando Quijano, allegedly with the participation of the National Police together with the criminal groups called COEXISTENCE of Commune 10 in the city of Medellín. On March 12, 2015, information was leaked detailing that the cohabitants of Commune 10 intended to attack Luis Fernando Quijano.

16. In 2016, the representation notified of the death of Jairo Iván Maya Rodríguez. On May 12, 2016, a risk level evaluation was carried out on the immediate family members of Luis Fernando Quijano, yielding an ordinary result. Irregularities were reported in the security escort teams of Luis Fernando Quijano and Martín Alonso Velásquez, consisting of follow-up acts and unilateral security escort withdrawals; a lack of maintenance of the security teams; and a lack of concrete information regarding the investigations. Regarding threatening events, it was stated that on April 28, 2016, the National Police killed the head of a criminal gang outside the headquarters of CORPADES. On May 25, around the headquarters of the Corporation, two subjects tried to steal a security van. They were detained by the assigned security escorts. In 2017, it was reported that in April 2016, the ground transportation supports granted to Yeisme Romero Fuenmayor, Juan David Muñoz, Rafael Emiro Bedoya, and Guillermo Osorio were terminated.

17. Since May 18, 2017, there had been evidence of the presence of alias *Pichi*, in charge of various criminal groups, near the home of Luis Fernando Quijano. In the second week of July 2017, CORPADES was allegedly subjected to cyber-attacks. On July 25, 2017, the family of one of the social leaders working in the Corporation (name not specified) received death threats by phone call. On August 23, 2017, a freight attempt allegedly occurred⁷ in the parking lot of Mr. Quijano's residence. There was reportedly knowledge of the organization of an operation to assassinate Luis Fernando Quijano, as well as the existence of a reward of 500 million pesos for those who execute an attack against the beneficiary (the date is not mentioned). The development of a consultation meeting on precautionary measures on September 5, 2017, was notified.

⁷ Theft in which the offender waits for his victim to leave the bank after having withdrawn a sum of cash and threatens him with a firearm. *Asociación de Academias de la Lengua Española, Diccionario de Americanismos Fleteo*, 2010.

18. In 2020, it was announced that, due to the facts they faced, CORPADES was forced to change its headquarters in 2018. In the following days, the presence of people who seemed to be watching the headquarters and the members of CORPADES was observed. On June 7, 2020, two subjects entered the headquarters of the Corporation; subsequently, they were captured by the authorities. In November 2020, the president of CORPADES was informed that people of a suspicious attitude were arriving around the headquarters, some of them armed. In February 2020, a consultation meeting on the measures was held. It was indicated that Martín Alonso Velásquez has a security escort, a means of communication, and a vest; Santiago Quijano has two protection men, a conventional vehicle, a means of communication, and a vest; Carlos Mario Arenas has a conventional vehicle, a means of communication, and a vest; Luis Fernando Quijano has a conventional vehicle, an armored vehicle, and six protection persons; and Rafael Emiro Bedoya, Guillermo Osorio, and Yeisme Romero Fuenmayor have a shared protection detail consisting of a vehicle and two security escorts. On the other hand, it was reported that Alberto Mazo Monsalve had left the country.

19. Through communication dated April 19, 2024, the representation indicated that the situation of risk allegedly forced Román Mazo Monsalve, Santiago Quijano Moreno, the daughter of Luis Fernando Quijano, and the sons of Martín Alonso Velásquez to leave the country. It was stated that as a protection measure, some members of CORPADES had opted for self-censorship. In addition, failures within the protection vehicle assigned to Luis Fernando Quijano were made known. On January 22, an alert was issued to the State because the protection vehicle was deliberately turned off by satellite twice. In July 2024, it was reported that Carlos Mario Arenas and Martín Alonso Velásquez were considering leaving the country.

20. In the 2024 communication, it was mentioned that Luis Fernando Quijano Moreno, as president of CORPADES and General Editor and journalist of the News Agency “Urban Analysis,” had benefited from a protection detail since 1998. In 2022, he was assigned a protection detail consisting of an armored vehicle, a conventional vehicle, five protection personnel, a means of communication, and an armored vest. On October 25, 2023, a resolution was issued reducing the security detail to one armored vehicle and two protection personnel due to the lack of complaints to the Office of the Attorney General. In January 2024, Luis Fernando Quijano Moreno filed a request for protection of constitutional rights (tutela) for the reinstatement of the protection measures. This legal action was ruled in his favor on March 20, 2024. The case of Luis Fernando Quijano Moreno is under an active work order to reassess the level of risk since November 15, 2023. The beneficiary claims to be at extraordinary risk due to multiple threats made against his life by illegal groups (no details of the threats are provided). In summary, the beneficiaries receiving protective measures are:

- a) Luis Fernando Quijano Moreno enjoys a protection detail consisting of an armored vehicle and two protection personnel.
- b) Juan David Muñoz Estrada and Yeisme Romero Fuenmayor have a shared protection detail consisting of two protection men, a conventional vehicle, as well as a bulletproof vest and a means of communication for each.
- c) Rafael Emiro Bedoya and Guillermo de Jesús Osorio Pérez each have a bulletproof vest and a means of communication.

21. At last, Luis Fernando Quijano Moreno reported the reception of death threats. It was recalled that, in 2023, the corporation was the victim of several cyberattacks that culminated in the total loss of its files on October 26, 2023.

IV. ANALYSIS OF THE REQUIREMENTS OF SERIOUSNESS, URGENCY, AND IRREPARABLE HARM

22. The precautionary measures mechanism is part of the Commission’s functions of overseeing compliance with the human rights obligations established 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 Statute of the IACHR; while the mechanism of

precautionary measures is set forth in Article 25 of the Commission's Rules of Procedure. In accordance with this Article, the IACHR grants precautionary measures in urgent and serious situations in which these measures are necessary to avoid irreparable harm to persons or to the subject matter of a petition or case before the organs of the inter-American system.

23. The Inter-American Commission and the Inter-American Court of Human Rights ("the Inter-American Court" or "I/A Court H.R.") have established repeatedly that precautionary and provisional measures have a dual nature, both protective and precautionary.⁸ Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.⁹ To do this, the IACHR shall assess the problem raised, the effectiveness of state actions to address the situation described, and the vulnerability to which the persons proposed as beneficiaries would be exposed if the measures are not adopted.¹⁰ Regarding their precautionary nature, these measures have the purpose of preserving a legal situation while under study by the organs of the inter-American system. Their precautionary nature aims at safeguarding 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, thus, avoid any further infringement of the rights at issue, a situation that may adversely affect the useful effect of the final decision. In this regard, precautionary or provisional measures allow the State concerned to comply with the final decision and, if necessary, to implement the ordered reparations. 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.

24. In this sense, Article 25(7) of the Commission's Rules of Procedure establishes that decisions granting, extending, modifying or lifting precautionary measures shall be adopted through reasoned resolutions. Article 25(9) sets forth that the Commission shall evaluate periodically, at its own initiative or at the request of either party, whether to maintain, modify or lift the precautionary measures in force. In this regard, the Commission shall assess whether the serious and urgent situation and the risk of irreparable harm that caused the adoption of the precautionary measures persist. Furthermore, it shall consider whether there are new situations that may meet the requirements outlined in Article 25 of its Rules of Procedure.

25. Similarly, the Commission recalls that while the assessment of the procedural requirements when adopting precautionary measures is carried out from a *prima facie* standard of review, keeping such

⁸ I/A Court H.R., [Case of the Yare I and Yare II Capital Region Penitentiary Center \(Yare Prison\)](#), 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.

⁹ 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).

¹⁰ 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).

measures in force requires a more rigorous evaluation.¹¹ In this sense, when no imminent risk is identified, the burden of proof and argument increases over time.¹² The Inter-American Court has indicated that the passage of a reasonable period of time without any threats or intimidation, added to the lack of imminent risk, may lead to the lifting of international protection measures.¹³

26. In this matter, the Commission recalls that the precautionary measures were granted in 2008 and extended in 2010 in favor of twelve members of the Corporation for Peace and Social Development (CORPADES). Upon granting the precautionary measures, the Commission understands that protection measures were implemented in favor of the beneficiaries at various times. The parties' most recent available information reveals the following:

- i. *Luis Fernando Quijano Moreno*: An armored vehicle and two protection personnel were deployed. In 2024, he indicated that he had suffered death threats; however, no specific details or facts were provided under the terms of Article 25 of the IACHR Rules of Procedure.
- ii. *Carlos Mario Arenas*: He had a conventional vehicle, a means of communication, and a vest provided to him. No events were reported against him since 2012. In 2024, it was noted that he was considering leaving the country.
- iii. *Teresa Muñoz Lopera*: There is no information on events against her or on her current situation.
- iv. *Alberto Mazo Monsalve*: In 2020, it was reported that the beneficiary left the country.
- v. *Dillier Fernando Vásquez Rúa*: In 2010, protection measures in his favor were detailed. Subsequently, no information was provided about his situation throughout the precautionary measures procedure.
- vi. *Santiago Quijano*: By 2020, it was revealed that he had two protection men, a conventional vehicle, a means of communication, and a vest. In 2024 it was alerted that he had left the country.
- vii. *Martín Alonso Velásquez*: As of 2020, it was stated that he had a security escort, a means of communication, and a vest. There are no additional factual elements about his current situation. In 2024, it was alerted that he was evaluating leaving the country.
- viii. *Guillermo Osorio*: In 2024, it was reported that he had a bulletproof vest and a means of communication. There are no additional factual elements about his current situation.
- ix. *Jairo Iván Maya Rodríguez*: The representation indicated about his death in 2016. There are no elements to assess the circumstances of his death.
- x. *Yeisme Romero Fuenmayor*: In 2024, it was stated that he shared a protection detail with Juan David Muñoz consisting of two protection men and a conventional vehicle. There are no additional factual elements about his current situation.
- xi. *Juan David Muñoz*: In 2024, it was reported that he shared a protection detail with Yeisme Romero Fuenmayor, who had two protection men and a conventional vehicle. There are no additional factual elements about his current situation.
- xii. *Rafael Emiro Bedoya*: In 2024, it was announced that he had a bulletproof vest and a means of communication. There are no additional factual elements about his current situation.

27. In addition to the above, it was reported that the headquarters of CORPADES had, at some point, a fixed post of the National Police, which carried out patrols and rounds, in particular at the home of Luis Fernando Quijano.

¹¹ I/A Court H.R., [Case of Fernandez Ortega et al.](#), Provisional Measures regarding Mexico, Order of February 7, 2017, considerandums 16 and 17.

¹² I/A Court H.R., [Case of Fernandez Ortega et al.](#), previously cited, considerandums 16 and 17.

¹³ I/A Court H.R., [Case of Fernandez Ortega et al.](#), previously cited, considerandums 16 and 17.

28. Consequently, the Commission assesses that the State implemented protection measures in favor of the twelve beneficiaries, including the holding of at least 13 consultation meetings.¹⁴ The protection measures have been implemented since at least 1998, in the case of Luis Fernando Quijano Moreno, and are reportedly in force with various modifications according to the results of the risk analyses. Throughout the procedure, both parties confirmed the implementation of the measures. Although the representation questioned, in general terms, the protection measures at various times, the Commission does not have sufficient elements to assess that their implementation has not been ideal or ineffective to date. Regarding the questions regarding the reduction of protection details, the Commission understands that the State has carried out multiple risk assessments,¹⁵ which must continue to be carried out to define the specific protection measures to be implemented based on the current situation of the beneficiaries.

29. In this regard, the Commission recalls that the risk assessment is the means by which the State may identify the most suitable and effective measures or “the most appropriate mechanisms to comply with the measures dictated by the organs of the inter-American system,”¹⁶ which corresponds to the State through its national mechanisms for the protection of persons at risk.¹⁷ In this regard, taking into account the temporary and provisional nature of the protection measures, it is important to update the risk assessments and adjust the components of the security measures.¹⁸

30. Following the exchanges of information between the parties, the Commission did not identify new and specific facts against the beneficiaries since at least 2020. After indicating to the representation that the IACHR would proceed with an analysis on whether the risk persisted, the representation presented a communication in 2024 that mentioned threats against Luis Fernando Quijano Moreno; however, no details were provided that would allow for a concluding compliance with the requirements of Article 25 of the Rules of Procedure, and no risk information was presented with respect to the other beneficiaries. In this regard, the Commission recalls that the representatives of the beneficiaries who wish the measures to continue must present proof of reasons for doing so.¹⁹

31. The Commission emphasizes that this matter has been monitored by the Commission through the mechanism for about 17 years. In this regard, it appreciates the State’s willingness to implement measures during the time they have been in force, to carry out risk analyses, and to adopt internal measures for the protection of the beneficiaries.

32. As per all the available information, and in light of the analysis previously carried out, the Commission considers at this time it does not have the necessary information to identify a situation presenting a risk that would meet the requirements of Article 25 of the Rules of Procedure. In view of the above, and taking into account the exceptional and temporary nature of precautionary measures,²⁰ the Commission deems it appropriate to lift these precautionary measures. Without prejudice to the lifting of these precautionary measures, the Commission calls upon the State to continue implementing the security measures it has been deploying, as well as the relevant investigations.

¹⁴ For example, dates of conciliation meetings: November 20, 2009; June 25, 2010; February 4 and May 9, 2011; September 14, 2012; November 15 and December 9, 2013; April 25, 2014; May 14, 2015; September 5, 2017; February 2020; June 3, 2022; and June 8, 2023.

¹⁵ For example, dates of risk assessments: March 13, 2012, December 13, 2013, between 2015 and 2016 (no details of dates were provided), February 21 and September 29, 2017. There is also a 2023 risk reassessment order regarding Luis Fernando Quijano Moreno.

¹⁶ IACHR, [Towards a Comprehensive Policy to Protect Human Rights Defenders](#), OAS/Ser.L/V/II. Doc. 207/17, approved on December 30, 2017, para. 333; [Second report on the Situation of Human Rights Defenders in the Americas](#), OEA/Ser.L/V/II. Doc.66, approved on December 31, 2011, paras. 456-460.

¹⁷ IACHR, [Towards a Comprehensive Policy to Protect Human Rights Defenders](#), previously cited, para. 263, 264, 281, 299 et al.

¹⁸ IACHR, previously cited, paras. 321-324.

¹⁹ IACHR, [Basic Guidelines for the Investigation of Violations of the Rights of Human Rights Defenders in the Americas](#), OEA/Ser.L/V/II., December 31, 2017, paras. 28-30.

²⁰ I/A Court H.R., [Matter of Adrián Meléndez Quijano et al.](#), Provisional Measures regarding El Salvador. Order of the Court of August 21, 2013, para. 22; [Matter of Galdámez Álvarez et al.](#), Provisional Measures regarding Honduras, Order of the Inter-American Court of Human Rights of November 23, 2016, para. 24 (Available only in Spanish).

33. The Commission recalls that the lifting of these measures does not prevent the representation from filing a new request for precautionary measures should they consider that there is a situation that meets the requirements established in Article 25 of its Rules of Procedure.

V. DECISION

34. The Commission decides to lift the precautionary measures granted in favor of (1) Luis Fernando Quijano, (2) Carlos Mario Arenas, (3) Teresa Muñoz Lopera, (4) Alberto Mazo Monsalve, (5) Dillier Fernando Vásquez Rúa, (6) Santiago Quijano, (7) Martín Alonso Velásquez; (8) Guillermo Osorio, (9) Jairo Iván Maya Rodríguez, (10) Yeisme Romero Fuenmayor, (11) Juan David Muñoz, and (12) Rafael Emiro Bedoya, in Colombia.

35. The Commission emphasizes that regardless of the lifting of these measures, in accordance with Article 1(1) of the American Convention, it is the obligation of the State of Colombia to respect and guarantee the rights recognized therein, including the life and personal integrity of the beneficiaries.

36. The Commission instructs the Executive Secretariat of the IACHR to notify this resolution to the State of Colombia and the representation.

37. Approved on February 24, 2025, by Roberta Clarke, 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