

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION TO LIFT PRECAUTIONARY MEASURES 24/2025**

Precautionary Measure No. 110-99

Edgar Quiroga, Gildardo Fuentes, and other persons regarding Colombia¹

March 2, 2025

Original: Spanish

I. SUMMARY

1. The Inter-American Commission on Human Rights (IACHR) decides to lift these precautionary measures in favor of Edgar Quiroga, Gildardo Fuentes et al., in Colombia. At the time of making the decision, the Commission assessed the actions taken by the State during implementation, as well as the lack of events that put the beneficiaries at risk since 2022. Upon not identifying compliance with the procedural requirements, the IACHR has decided to lift these precautionary measures.

II. BACKGROUND INFORMATION

2. On November 29, 1999, the Commission granted precautionary measures and requested that the State take the necessary actions to protect the life and physical integrity of Edgar Quiroga and Gildardo Fuentes, spokespersons for *Éxodo Campesino del Magdalena Medio* (Rural Exodus of Magdalena Medio), and to determine their whereabouts. According to the information received, on November 28, 1999, Edgar Quiroga and Gildardo Fuentes were intercepted by units of the 45 Heroes de Majagual battalion near La Placita, Cerro Azul, San Pablo. According to the information provided, the detainees were tied to a tree and tortured, after which they were held by the Autodefensas [paramilitary self-defense groups in Colombia], who publicly recognized their participation in the matter. The Commission also requested that measures be adopted to guarantee the safety of the inhabitants of the La Placita neighborhood who witnessed and reported the acts of torture.²

3. On December 6, 1999, the Commission extended precautionary measures in favor of Mr. Libardo Campo Traslaviña, Gilberto Guerra Hernández, Andrés Gil, Francisco José Campo, Ramón Rangel, José Cediél Mondragón Sánchez, Isidro Alarcón Bohórquez, and Tito Muñoz, who, like Mr. Edgar Quiroga, served as spokespersons of *Éxodo Campesino del Magdalena Medio*.³ On November 1, 2000, the Commission extended the precautionary measures in favor of the spokespeople of *Exódo Campesino* from southern Bolívar to protect the life and personal integrity of the members of the Rural Association of the Cimitarra River Valley (*Asociación Campesina del Valle del Río Cimitarra, ACVC*). They were allegedly designated as military targets by paramilitary groups in the region, and subjected to threats and multiple attempts on the lives of their leaders.⁴

4. This matter is linked to Case 12.636, pending before the IACHR.

5. The Colombian Commission of Jurists (*Comisión Colombiana de Juristas*) and the Corporation for the Defense and Promotion of Human Rights REINICIAR (*Corporación para la Defensa y Promoción de los Derechos Humanos REINICIAR*) exert representation before the Commission.

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

² Inter-American Commission on Human Rights (IACHR), Annual Report 1999, Chapter III, [Section C: Petitions and Cases before the Inter-American Commission on Human Rights, para. 23](#).

³ IACHR, Annual Report 1999, Chapter III, [Section C: Petitions and Cases before the Inter-American Commission on Human Rights, para. 24](#).

⁴ IACHR, Annual Report 2000, Chapter III, [Section C: Petitions and Cases before the Inter-American Commission on Human Rights, para. 23](#).

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

A. Procedure during the time the measures were in force

6. During the time the precautionary measures were in force, the Commission followed-up on the situation by requesting information from the parties and holding working meetings⁵ and a thematic hearing.⁶ In recent years, communications received from the parties and from the IACHR have been registered on the following dates:

	Reports from the State	Communications by the representation	IACHR
2010	June 22	May 28, June 22	July 10, November 1
2011	<i>No communications</i>	February 15	<i>No communications</i>
2012	September 25, November 6	<i>No communications</i>	July 10, October 12, November 21
2013	April 29, July 8	<i>No communications</i>	December 30
2015	<i>No communications</i>	October 23	<i>No communications</i>
2016	August 10, October 6	<i>No communications</i>	July 7, September 13
2017	<i>No communications</i>	<i>No communications</i>	May 3
2021	<i>No communications</i>	September 28	<i>No communications</i>
2022	April 13, September 22	September 28	June 21, October 24
2023	January 3	<i>No communications</i>	July 18
2024	September 3, October 10	September 9	July 22, September 6, September 11

7. On July 22, 2024, the Commission requested information from the representation in order to evaluate keeping the precautionary measures in force. On September 9, 2024, the representation requested an extension, which was granted on September 11. The Commission recalls that the State requested that these precautionary measures be lifted on November 6, 2012, and reiterated the request on April 9 and July 8, 2013. To date, the Commission has not received a response from the representation and all the deadlines have expired. The last communication from the representation with factual information on the beneficiaries' situation dates from 2022.

B. Information provided by the State

8. In June 2010, the State reported on a follow-up and consultation meeting held on April 29, 2010, at which agreements were reached. In 2012, the State recalled that, since 2002, the ACVC has collective protection detail. The Office of the Attorney General (FGN) linked one person to the disappearance of Edgar Quiroga and Gildardo Fuentes as the mastermind. The Office of the Inspector General (PGN) carried out three disciplinary investigations. The State requested that the precautionary measures be lifted after 11 years, considering that there are no elements to find compliance with Article 25 of the Rules of Procedure. In April and July 2013, the State reiterated its request to lift these measures.

⁵ Working meeting held on March 20, 2010 within the framework of the 138 Period of Sessions.

⁶ IACHR, [Hearing 185 Period of Sessions. Implementation of precautionary measures in favor of defenders in Colombia](#), October 27, 2022 (Available only in Spanish).

9. In October 2016, the State warned that the Human Rights Coordination of the Magdalena Medio Police Department provided permanent accompaniment to the president of the ACVC and other members of the Board of Directors. It was requested that preventive measures be implemented, including patrols and random security checks at the ACVC headquarters. It was recalled that the Association has a collective detail.⁷ Moreover, members of the Association have individual protection measures in their favor.⁸

10. On April 13, 2022, the State requested an updated census of the beneficiaries in order to implement the precautionary measures. In September 2022, the State announced that an investigation had been initiated into the crime of threats against Ramiro Ortega Muñetón in relation to the events of August 26, 2021. By 2021, Ramiro Ortega Muñetón had a collective protection detail, shared with Miguel Ángel González Huepa, consisting of an armored vehicle and two protection agents, and an individual protection detail that consisted of a means of communication and an armored vest. It was commented that there was a collective risk analysis work order in favor of the ACVC and three risk assessment workshops had been held on July 22, 24 and 25, 2019.

11. On July 6, 2022, the Technical Team for Collective Risk Assessment (*Cuerpo Técnico de Análisis de Riesgo Colectivo*) requested an update of the collective risk of the Association, and a meeting with the beneficiaries was held on July 28, 2022. The State reiterated its request for an updated census. In January 2023, the State once again requested the list of beneficiaries and noted that two active investigations for threats involving members of the Association and, one for theft, were underway.

12. In 2024, it was noted that the Police continued to implement preventive activities, in particular, patrols, checks, and police rounds. The motorized patrol known as “Patrulla Líderes” strengthened the accompaniment of vulnerable groups and populations in the Magdalena Medio region and continued to deploy the Strategy for the Care of Vulnerable Populations (ESPOV). It was reported that on April 1, 2024, an institutional route was activated in favor of María Irene Ramírez Anaya. Colombia explained that the Ministry of National Defense has sought to maintain a permanent dialogue with the beneficiaries. Moreover, it was reported that there is an active investigation into Francisco José Campo and 10 active investigations into individuals who are registered as members of the ACVC. Lastly the State emphasized that the updated beneficiary census would clarify to whom the State’s actions should be directed and enable the submission of relevant information, particularly regarding the investigations in which they are involved.

C. Information provided by the representation

13. In 2010, the representation referred to an email threat against several social and human rights organizations in the Magdalena Medio region, including the ACVC. In February 2011, the representation reported that, in November 2010, the ACVC was awarded the National Peace Prize, and it had received threats as a result. In 2015, the representation reported that María Irene Ramírez Amaya, legal representative of ACVC, filed a disciplinary complaint against agents of the National Police of Puerto Berrio for acts of harassment against her security agent. It was noted that, between January 9, 2014 and August 23, 2015, 13 incidents took place against members and directors of the ACVC consisting of threats, harassment, surveillance, and intimidation. On February 1, 2021, Jaminton Ávila was murdered. In September 2021, the representation warned that on August 26 and September 17, 2021, Ramiro Ortega Muñetón, a member of the ACVC, received death threats by telephone and abandoned his work as a rural leader.

⁷ Consisting of an armored vehicle, five protection agents, five communication devices, and five armored vests.

⁸ Melkin Hernán Castrillón Peña and Eladio Antonio Morales Polo each have a means of communication and a bulletproof vest, and on March 17, 2016, they were ordered transportation support in the amount of two current legal monthly minimum wages (SMMLV) for a period of three months. On April 15, 2015, there was an order to ratify the protection detail in favor of César Hernán Jerez Martínez, consisting of an armored vehicle, three security agents, a means of communication and an armored vest.

14. In December 2021, Miguel Cifuentes and Mauricio Ramos, directors of the ACVC, were declared military targets by dissidents of the Revolutionary Armed Forces of Colombia (FARC). On January 8, 2022, a meeting with Luis Francisco González, coordinator of the South Bolívar section of the ACVC, was abruptly interrupted by members of the Gaitanista Self-Defense Forces of Colombia (AGC). On June 29, 2022, Evaristo Mena Rentería, coordinator of the Northeast Antioquia Branch and of the Moral and Ethical Council of the ACVC, had her cellphone stolen. On July 30, 2022, an unknown man entered the residence of María Irene Ramírez, president of the Association, and stole her cell phone. On August 8, 2022, the Association had to suspend a tour to talk about human rights in the Panama 9, Carrizal, Lejanías, and Ojos Claros de Remedios neighborhoods because the armed groups in the area prevented the group of brigadistas from entering. In September 2022, the representation denounced armed groups in the South of Bolívar, the Cimitarra River Valley, and the Northeast of Antioquia.

15. In 2023 and 2024, the representation did not provide any information or response to the State's request for the census which was deemed necessary to implement these precautionary measures.

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

16. 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.

17. 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.⁹ Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.¹⁰ 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.¹¹ 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

⁹ Inter-American Court of Human Rights (IACHR), [Matter of the Yare I and Yare II Capital Region Penitentiary Center \(Yare Prison\)](#), Request for Provisional Measures submitted by the IACHR regarding the Bolivarian Republic of Venezuela, Order of March 30, 2006, considerandum 5; [Matter of Carpio Nicolle et al. v. Guatemala](#), Provisional Measures, Order of July 6, 2009, considerandum 16.

¹⁰ 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).

¹¹ 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).

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.

18. 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.

19. 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 measures in force requires a more rigorous evaluation.¹² In this sense, when no imminent risk is identified, the burden of proof and argument increases over time.¹³ 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.¹⁴

20. In this matter, the Commission recalls that the precautionary measures have been in force since 1999. Considering that there are several groups protected under this matter, their individual corresponding assessment is present below:

- a. **Precautionary measures granted in favor of Edgar Quiroga, Gildardo Fuentes, and the residents of La Placita who witnessed and reported the acts of torture.**

21. The Commission notes that the precautionary measures granted in November 1999 were motivated by the disappearance of Edgar Quiroga and Gildardo Fuentes. Considering that about 25 years have elapsed since then, the Commission understands that, at present, the assessment of the actions implemented by the State should be carried out within the framework of the Petition and Case System. It is also noted that the representation never presented updated information about these beneficiaries. In line with the observations made by the Inter-American Court,¹⁵ in cases where a person’s whereabouts are unknown, as in this matter, the precautionary measures aimed to ensure that the competent authorities take prompt action to prevent irreparable harm. Similarly, the Commission interprets that these precautionary measures, like the provisional measures, cannot be extended indefinitely given their temporary nature.

22. Lastly, regarding the inhabitants of the La Placita neighborhood who witnessed and reported the acts of torture, the Commission notes that, since the granting of the precautionary measure, there has been

¹² I/A Court H.R., [Case of Fernández Ortega et al.](#), Provisional Measures regarding Mexico, Order of February 7, 2017, considerandums 16 and 17 (Available only in Spanish).

¹³ I/A Court H.R., [Case of Fernández Ortega et al.](#), previously cited.

¹⁴ I/A Court H.R., [Case of Fernández Ortega et al.](#), previously cited.

¹⁵ I/A Court H.R., [Matter of Juan Almonte Herrera et al.](#) regarding the Dominican Republic, Provisional Measures, Order of November 13, 2015, considerandum 14 (Available only in Spanish).

no further information on their situation. Despite requests for information, no response was provided on situations that potentially place the inhabitants of La Placita at risk.

b. Precautionary measures granted to identified spokespersons of Éxodo Campesino

23. Regarding Libardo Campo Traslaviña, Gilberto Guerra Hernández, Andrés Gil, Francisco José Campo, Ramón Rangel, José Cediél Mondragón Sánchez, Isidro Alarcón Bohórquez, and Tito Muñoz, the Commission observes that neither of the parties has submitted a response regarding these beneficiaries since at least 2010. Consequently, there has been no information about their situation for more than a decade.

c. Precautionary measures granted in favor of the members of *Asociación Campesina del Valle del Río Cimitarra* - ACVC

24. Following the granting of precautionary measures in favor of the ACVC members, the Commission acknowledges that the State has implemented measures to protect the beneficiaries. However, there is no information on their current situation, despite repeated requests by the Commission. The latest information on events that place the ACVC members at risk dates from August 2022, when the Association had to suspend a tour of discussions on human rights due to the presence of armed groups. Moreover, the Commission observes that the State adopted protection measures in favor of the ACVC members. Since 2002, collective and individual protection measures have been implemented, such as armored vehicles, protection personnel, communication equipment, and bulletproof vests, among other preventive measures.

25. In particular, the Commission emphasizes that there is no information on the current members of the ACVC, despite having forwarded a request from the State to submit a census of the beneficiaries. Despite requesting information from the representation, the Commission has not received a response. The above is relevant for keeping these precautionary measures in force.¹⁶ In this regard, the Commission recalls the provisions of Article 25 (11) of its Rules of Procedure:

“11. In addition to the terms of subparagraph 9, the Commission may lift or review a precautionary measure when the beneficiaries or their representatives, without justification, fail to provide a satisfactory reply to the Commission on the requirements presented by the State for their implementation.”

26. The Commission recalls that when a State requires the lifting of a precautionary measure, it must present sufficient evidence and arguments to support its request. In the same way, the representatives of the beneficiaries that want the measure to continue must produce evidence of the reasons why. In the matter at hand, the Commission takes into account that the State has been requesting the lifting of the precautionary measures since 2012; and that, as expressed in the above paragraphs, it does not have the factual elements to considered that the requirements of Article 25 of its Rules of Procedure are fulfilled. In view of the above, and

¹⁶ IACHR, [Resolution to Lift 76/2024](#), Precautionary Measure No. 9-02, Afro-Colombian Families in 49 Caseríos in the Naya River basin regarding Colombia, October 24, 2024. In the same sense, in [Follow-up Resolution 48/2022, Precautionary Measure No. 264-13](#), Members of Damas de Blanco (Ladies in White) regarding Cuba, September 28, 2022, the Commission requested the representation to “update the census of its members on a regular basis. This will allow this Commission to properly monitor their situation under the terms of Article 25 of its Rules of Procedure, and to have up-to-date information on who the current members are, in a timely manner. The Commission also requests that the representation include, together with the updated census, the concrete facts that the identified persons have been facing in the country,” para. 45. Moreover, it mentioned that “failing this, the Commission will send the State the information on the current members of the organization on the understanding that the State must know the beneficiaries that this international body has asked it to protect in the terms of the applicable international standards,” para. 46.

taking into account their exceptional and temporary nature,¹⁷ the Commission considers that it is appropriate to lift these precautionary measures.

27. In line with the Inter-American Court,¹⁸ 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 all the beneficiaries.

V. DECISION

28. The Commission decides to lift the precautionary measures granted in favor of Edgar Quiroga, Gildardo Fuentes, and other persons, in Colombia.

29. 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.

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

31. Approved on March 2, 2025, by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Arif Bulkan, Second Vice-President; Edgar Stuardo Ralón Orellana; Roberta Clarke; and Gloria Monique de Mees, members of the IACHR.

Tania Reneaum Panszi
Executive Secretary

¹⁷ I/A Court H.R., Matter of Adrián Meléndez Quijano et al., Provisional Measures regarding El Salvador, [Order of August 21, 2013](#), para. 22; Matter of Galdámez Álvarez et al., Provisional Measures regarding Honduras, [Order of November 23, 2016](#), para. 24 (Available only in Spanish).

¹⁸ I/A Court H.R., Matter of Giraldo Cardona et al., Provisional Measures Regarding Colombia, [Resolution of January 28, 2015](#), considerandum 40 (Available only in Spanish).