

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION 3/2025**

Precautionary Measure No. 16-25

Carlos José Correa Barros regarding Venezuela

January 10, 2025

Original: Spanish

I. INTRODUCTION

1. On January 8, 2025, the Inter-American Commission on Human Rights (“the Inter-American Commission,” “the Commission” or “the IACHR”) received a request for precautionary measures filed by the organizations *Espacio Público*, *Centro por la Justicia y el Derecho Internacional* (CEJIL), and *Comisión Internacional de Juristas* (“the requesting party” or “the applicants”) urging the Commission to request that the Bolivarian Republic of Venezuela (“the State” or “Venezuela”) adopt the necessary measures to protect the rights of Carlos José Correa Barros (“the proposed beneficiary”). According to the request, the proposed beneficiary is a human rights defender and executive director of the organization *Espacio Público*. He was reportedly detained on January 7, 2025, by Venezuelan state security authorities and his whereabouts are currently 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 State on January 8, 2025. To date, the IACHR has not received a response from Venezuela and the granted deadline has expired. The applicant submitted additional information on January 9, 2025.

3. Upon analyzing the submissions of fact and law furnished by the requesting party, the Commission recognizes that the proposed beneficiary is in a serious and urgent situation, given that his current location is unknown to date. Consequently, 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 Carlos José Correa Barros. In particular, provide official information on whether he is in the custody of the State and the circumstances of his detention, or on the measures taken to determine his whereabouts or fate; b) implement the necessary measures so that the beneficiary can carry out his human rights defense activities without being subjected to threats, stigmatizing and disqualifying statements, harassment, or acts of violence; c) establish the necessary measures to ensure that the conditions of detention of the beneficiary are compatible with the applicable international standards on the matter, including: i. guaranteeing regular contact and access to his family members, his attorneys, and representatives; ii. provide official information on the legal situation of the beneficiary in the framework of the criminal proceedings in which he is allegedly involved, such as the reasons why he has not been released to date, and whether he has been brought before a court for a review of his detention; and iii. immediately carry out a medical assessment of his health situation and guarantee access to the necessary medical care; d) consult and agree upon the measures to be adopted with the beneficiary and his representatives; and e) report on the actions taken to investigate the alleged facts that gave rise to this resolution, so as to prevent such events from reoccurring.

II. SUMMARY OF FACTS AND ARGUMENTS

A. Information provided by the requesting party

4. The request mentions that Carlos José Correa is a human rights defender and executive director of the organization *Espacio Público*.¹ He was reportedly arrested by hooded officers, dressed in black and without identification, on January 7, 2025 at 5:00 p.m. This incident took place in the center of Caracas, Venezuela, while he was driving from the *Espacio Público* headquarters to his residence.

5. According to a close witness, the proposed beneficiary was intercepted by State security officials, who took his vehicle and began to drive it with him on board. They allegedly took the proposed beneficiary to various areas of Caracas. The requesting party characterizes the detention as arbitrary and as an enforced disappearance. The proposed beneficiary reportedly does not have any protection measures granted by the State. It is noted that his detention occurred within a broader context of intensified post-election repression targeting human rights defenders, political activists, and social leaders. This escalation was particularly pronounced in Caracas and surrounding areas, reportedly under a security operation initiated by the Ministry of the Interior and Justice just days before January 10, 2025, the day Nicolás Maduro was reportedly sworn in as president of Venezuela.

6. In an attempt to obtain information on Carlos Correa, his family and members of *Espacio Público* went to the headquarters of the Bolivarian National Police located in Maripérez, in the municipality of Libertador. They also visited Zone 7, located in the municipality of Sucre, in Miranda state. On January 8, 2025, in the morning hours, *Espacio Público's* legal team visited the headquarters of the Bolivarian National Intelligence Service (SEBIN) in Maripérez and El Helicoide. They then went to the headquarters of the Bolivarian National Police (PNB) and the Bolivarian National Guard (GNB) in Cotiza, both of which are located in Caracas. To date, the officials of these institutions have not provided any response as to the whereabouts of the proposed beneficiary or his current health.

7. On January 8, 2025, at approximately 11:30 a.m., at a press conference from the Palace of Justice of Caracas, Carlos Correa's wife, denounced the proposed beneficiary's situation. Additionally, she warned that he has endocrine and respiratory medical conditions that require constant medical care. A van displaying the SEBIN logo reportedly approached during the press conference outside the Palace. According to the requesting party, this reportedly increases suspicions of his direct involvement in the alleged events.

8. The requesting party further states that, on the night of January 8, the Minister of the Interior, Justice, and Peace, Diosdado Cabello, stated that Carlos Correa is involved in a "conspiracy plan" and criticized NGOs in Venezuela, labeling them as "money laundering operations." The Minister reportedly indicated that "[Correa] is not a human rights activist, but rather a political activist." He reportedly added that Mr. Correa "is involved in the conspiracy (...) All of them are at his level [NGOs]. Carlos Correa is not the only one involved."

9. Lastly, it was noted that *Espacio Público's* legal team attempted to file a writ of *habeas corpus* at the Palace of Justice. They observed that obstacles were encountered, and the appeal was only accepted after a five-hour wait. The request reported the unprotected situation to which the proposed beneficiary is exposed and denounced that at 11:30 a.m. on January 9, 2025, the proposed beneficiary was still missing.

B. Response from the State

10. The Commission requested information from the State on January 8, 2025. To date, the IACHR has not received a response from Venezuela and the granted deadline has expired.

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

¹ The organization reportedly seeks to promote and defend freedom of expression and access to public information.

11. The precautionary measures mechanism 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 Statute of the IACHR. 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 irreparable harm to persons.

12. 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.² Regarding the protective nature, these measures seek to avoid irreparable harm and protect the exercise of human rights.³ 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.⁴ As for their precautionary nature, these measures have the purpose of preserving legal situations while under the study of the IACHR. 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 (*effet utile*) of the final decision. In this regard, precautionary or provisional measures enable the State concerned to comply with the final decision and, if necessary, to implement the ordered reparations.⁵ In the process of reaching a decision, according to Article 25(2) of its Rules of Procedure, the Commission assesses 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.

13. In analyzing those requirements, the Commission reiterates that the facts supporting a request for precautionary measures need not be proven beyond doubt; rather, the information provided should be assessed from a *prima facie* standard of review to determine whether a serious and urgent situation exists.⁶ Similarly, the Commission recalls that, by its own mandate, it is not called upon to determine any individual

² 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).

³ 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)

⁴ 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).

⁵ 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).

⁶ 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.

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.⁷ This is better suited to be addressed by the Petition and Case system. The following analysis refers exclusively to the requirements of Article 25 of the Rules of Procedure, which can be resolved without making any determination on the merits.⁸

14. By the same token, 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, 1998,⁹ 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.”¹⁰ In addition, the Inter-American Commission highlights what was established by the United Nations Working Group on Enforced or Involuntary Disappearances, in the sense that “there is no minimum time, however short, to consider that an enforced disappearance has occurred.”¹¹

15. As regards the *context*, the Commission has been monitoring the rule of law and human rights situation in Venezuela since 2005,¹² and has included the country in Chapter IV.B of its Annual Report. The Commission has also issued press releases and country reports, and established a special follow-up mechanism for the country, known as MESEVE.

16. 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.¹³ The Commission has recently condemned the practices of institutional violence in the context of the electoral process in Venezuela, such as violent repression, arbitrary detentions, and political persecution.¹⁴ 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.¹⁵ The Commission also referenced the Report of the United Nations Independent International Fact-Finding Mission on Venezuela, which confirms the ongoing hostile environment faced by human rights organizations in the country. The report highlights campaigns of discredit, stigmatization, and harassment that persist as a consequence of their advocacy efforts.¹⁶

⁷ 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.

⁸ 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).

⁹ [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](#).

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

¹¹ 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.

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

¹³ IACHR, [2023 Annual Report, Ch. IV.B. Venezuela](#), previously cited, Recommendation 8.

¹⁴ IACHR, Press Release 184/24, [IACHR and SRFOE condemn State terrorism practices in Venezuela](#), August 15, 2024.

¹⁵ IACHR, Press Release 184/24, previously cited.

¹⁶ IACHR, [2023 Annual Report, Ch. IV.B. Venezuela](#), previously cited, parra. 21. Referring to the Human Rights Council, Report of the independent international fact-finding mission on the Bolivarian Republic of Venezuela, A/HRC/54/57, September 18, 2023, para. 70-72

17. In particular, in the press release of August 15, 2024, the IACHR and its Office of the Special Rapporteur for Freedom of Expression (SRFOE, or RELE in Spanish) stated that the regime in power is sowing terror as a tool to silence the citizenry and perpetuate the ruling authoritarian regime in power, and that Venezuela must cease practices immediately that violate human rights and reestablish democratic order and the rule of law.¹⁷ 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 “[t]he 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.”¹⁸

18. On December 27, 2024, the IACHR approved the report titled ‘Venezuela: Serious Human Rights Violations in the Electoral Context’ and reaffirmed that the State has been engaging in practices such as the arbitrary detention of opponents, human rights defenders, and social leaders,¹⁹ while using “terror as a tool of social control.”²⁰

19. The Commission understands that the circumstances in which the detention of the proposed beneficiary has taken place, along with the country contextual monitoring carried out by the IACHR, are relevant in the analysis of the procedural requirements. In this matter, the Commission emphasizes that, on January 8, 2025, the United Nations Special Rapporteur on Human Rights Defenders expressed concern about her detention situation under the conditions described below.²¹

20. In assessing the criterion of *seriousness*, the Commission observes that agents of the Venezuelan State detained Carlos José Correa Barros on January 7, 2025, and his whereabouts remain unknown to this day. The Commission expresses its concern regarding the update provided by the applicants, which indicates that the Minister of Interior, Justice, and Peace of the State made stigmatizing and disqualifying statements about the proposed beneficiary the day after his possible disappearance. The Minister reportedly stated that the proposed beneficiary was involved in a “conspiracy plan” and referring to NGOs in Venezuela as “money launderers.” The Minister reportedly stated that “[Correa] is not a human rights activist, but rather a political activist”; and that “he is involved in the conspiracy (...) All of them are at his level [NGOs]. Carlos Correa is not the only one involved.” The IACHR highlights that the Minister did not provide details on his situation or whereabouts. In this regard, the Commission reminds Venezuela:

the importance of human rights advocacy for the consolidation of democracies and the rule of law. For this reason, it calls for an end to harassment and arbitrary detentions, urging that these individuals be allowed to carry out their advocacy work without any form of intimidation or interference.²²

21. In addition, the Venezuelan authorities have refused to provide minimal information on his legal situation. Such as information on the type of crime for which he is being investigated; the competent court hearing the criminal case; the number of the judicial file; the existence of judicial orders to detain him and

¹⁷ IACHR, Press Release 184/24, previously cited.

¹⁸ IACHR, Press Release 184/24, previously cited.

¹⁹ IACHR, [Venezuela: Serious Human Rights Violations in the Electoral Context](#), OEA/Ser.L/V/II Doc. 253/24, December 27, 2024, para. 3 (Available only in Spanish).

²⁰ IACHR, Venezuela: Serious Human Rights Violations in the Electoral Context, previously cited, para. 5.

²¹ Lawlor, M. [@MaryLawlorhrds], I receive very disturbing news about the alleged enforced disappearance of the human rights defender and director of @espaciopublico [Tweet], January 8, 2025, available at <https://x.com/MaryLawlorhrds/status/1877068738500981222>.

²² IACHR, Press Release 198/24, [IACHR Condemns Persecution of Human Rights Defenders in Venezuela](#), August 29, 2024.

transfer him to a penitentiary; the exact place where he is being held; if he has undergone a medical evaluation since his detention; or if he is currently receiving medical treatment for pre-existing conditions.

22. In addition to the foregoing, the Commission notes that, since they do not have minimal official information about his legal situation, his family members and representatives do not have mechanisms that would allow them to challenge the actions taken by state agents before the competent judicial authority. In addition, the existing domestic obstacles to seeking protection for the proposed beneficiary are noted. In particular, it was reported that *Espacio Público's* legal team attempted to file a writ of *habeas corpus* on his behalf, but the Venezuelan authorities only received it after a five hour wait at 6:15 p.m. As long as the State fails to provide a clear response, it is believed that the proposed beneficiary remains in a state of complete vulnerability regarding the situations he may currently be facing.

23. Upon requesting information from the State, the Commission regrets its lack of response. Although the foregoing is not enough per se to justify the granting of a precautionary measure, it prevents the Commission from being aware of the observations or measures taken by the State to address the risk that the proposed beneficiary describes. Therefore, the IACHR does not have elements that would allow it to dispute the facts alleged by the requesting party, nor to assess whether the risk that the proposed beneficiary faces has been addressed or mitigated. In this regard, the Commission expresses its particular concern given that State agents, who hold a special responsibility as guarantors of the proposed beneficiary's human rights, have been identified as being responsible for his detention, since they have him in their custody.

24. In sum, the Commission finds that, from the applicable *prima facie standard*, it is sufficiently proven that the rights to life and personal integrity of the proposed beneficiary face a serious risk, since his whereabouts, detention conditions, and health remain unknown to date, after his detention on January 7, 2025. High State authorities are reportedly making stigmatizing statements against him, without providing information on his situation or whereabouts. In addition to the above, the competent authorities have created obstacles to the issuance of a writ of *habeas corpus* in his favor.

25. Regarding the requirement of *urgency*, the Commission finds that it has been fulfilled, insofar as the proposed beneficiary's whereabouts remain unknown, and because, with the passage of time, the likelihood of violations of his rights increases. In addition, the Commission highlights the difficulties imposed on family members and representatives when attempting to activate internal measures in order to locate the proposed beneficiary. Therefore, the Commission considers it necessary to adopt immediate measures to safeguard the rights of the proposed beneficiary.

26. 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

27. The Commission declares Carlos José Correa Barros as the beneficiary of the precautionary measures, who is duly identified in this proceeding.

V. DECISION

28. 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 requests that Venezuela:

- a) adopt the necessary measures to protect the rights to life and personal integrity of Carlos José Correa Barros. In particular, provide official information on whether he is in the custody of the

State and the circumstances of his detention, or on the measures taken to determine his whereabouts or fate;

- b) implement the necessary measures so that the beneficiary can carry out his human rights defense activities without being subjected to threats, stigmatizing and disqualifying statements, harassment, or acts of violence;
- c) establish the necessary measures to ensure that the conditions of detention of the beneficiary are compatible with the applicable international standards on the matter, including:
 - i. guaranteeing regular contact and access to his family members, his attorneys, and representatives;
 - ii. provide official information on the legal situation of the beneficiary in the framework of the criminal proceedings in which he is allegedly involved, such as the reasons why he has not been released to date, and whether he has been brought before a court for a review of his detention; and
 - iii. immediately carry out a medical assessment of his health situation and guarantee access to the necessary medical care;
- d) consult and agree upon the measures to be adopted with the beneficiary and his representatives; and
- e) report on the actions taken to investigate the alleged facts that gave rise to this resolution, so as to prevent such events from reoccurring.

29. 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.

30. The Commission emphasizes that, pursuant to Article 25(8) of its Rules of Procedure, the granting of precautionary measures and their adoption by the State do not constitute a prejudgment regarding the possible violation of the rights protected in the American Convention and other applicable instruments.

31. The Commission instructs its Executive Secretariat to notify this resolution to the Bolivarian Republic of Venezuela and the requesting party.

32. Approved on January 10, 2025, 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