
**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION TO LIFT PRECAUTIONARY MEASURES 41/2025**

Precautionary Measure No. 251-15
“Alejandro” and his family unit regarding Mexico¹

May 11, 2025

Original: Spanish

I. SUMMARY

1. The Inter-American Commission on Human Rights (IACHR) decides to lift these precautionary measures in favor of “Alejandro”² and his identified family unit, in Mexico. At the time of making the decision, the Commission assessed the actions taken by the State during the implementation and the lack of concrete, current, and specific events against the beneficiaries that would allow it to identify a situation of serious and imminent risk. Taking into account the nature of precautionary measures and in light of the information available, the Commission considered that it is currently not possible to establish a situation presenting a risk under the terms of Article 25 of the Rules of Procedure. Consequently, the IACHR decided to lift the measures.

II. BACKGROUND INFORMATION

2. On June 30, 2015, the IACHR granted precautionary measures in favor of “Alejandro” and his family unit,³ in Mexico. The request stated that “Alejandro” was the target of violence and threats as a result of being a survivor of acts of violence that occurred on January 6, 2015, in Apatzingán, Michoacán. The Commission considered that the requirements of seriousness, urgency, and irreparable harm were *prima facie* met, in the terms of Article 25 of the IACHR Rules of Procedure, and required that Mexico:

- a) adopt the necessary measures to preserve the life and personal integrity of Mr. “Alejandro” and his family members, which include adequate medical care, according to the current health of Mr. “Alejandro”;
- b) consult and agree upon the measures to be adopted with the beneficiaries and their representatives;
- c) report on the actions taken to investigate the alleged facts that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.⁴

3. On December 2, 2015, the IACHR extended these precautionary measures in favor of “Paco” and “José,”⁵ brother and cousin of “Alejandro”, respectively, who were the victims of acts of violence due to their proximity to “Alejandro”. The Commission considered that the requirements of seriousness, urgency, and irreparable harm were *prima facie* met, in the terms of Article 25 of the IACHR Rules of Procedure, and required that Mexico:

- a) adopt the necessary measures to preserve the life and personal integrity of “Paco” and “José”, relatives of “Alejandro”;

¹ In accordance with Article 17(2)(a) of the IACHR Rules of Procedure, Commissioner José Luis Caballero Ochoa, a Mexican national, did not participate in the debate and deliberation of this matter.

² It was requested that his identity be kept confidential, and he was therefore identified as “Alejandro”.

³ Composed of his mother and four siblings. Despite the fact that the request dated June 22, 2015 mentioned that the individuals would be provided in another document, it was never received. The only mentioned individual is the sibling identified as “S”. No specific identification was provided for any of the other siblings; it was only specified that “S” was 20 years old and the other three siblings were 18, 11, and 7 years old.

⁴ IACHR, [Resolution 23/2015](#), Precautionary Measures No. 251-15, Matter of “Alejandro” et al. regarding Mexico, June 30, 2015 (Available only in Spanish).

⁵ It was requested that the identities be kept confidential. These individuals are duly identified in the file.

- b) consult and agree upon the measures to be adopted with the beneficiaries and their representatives;
- c) report on the actions taken to investigate the alleged facts that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.
- d) strengthen the protection measures in favor of “Alejandro” and his family unit.⁶

4. On February 24, 2016, the representative organization, whose identity has been kept confidential, informed the Commission that it would no longer continue to act as representation. Subsequently, it was indicated that the Executive Commission for Attention to Victims (*Comisión Ejecutiva de Atención a Víctimas*, CEAV)⁷ would exert representation before the Commission.

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

A. Procedure during the time the measures were in force

5. Following the extension of the precautionary measures, the Commission followed-up on the situation by requesting information from the parties. In this regard, communications were received from the parties and sent from the IACHR on the following dates:

Year	State	Representation	IACHR
2016	March 14, July 20	February 24, April 21	April 14, June 20
2017	No information	No information	May 1
2019	No information	July 5, August 30	April 24, August 15
2022	June 10	March 18	January 31, February 14, March 30, May 27 (extension)
2023	April 19	No information	July 14
2024	September 13	May 31 (extension), July 12, September 13	May 14, June 12, July 15, November 20
2025	No information	February 17	

6. The State requested to lift the measures on April 19, 2023 and September 13, 2024. Following a period without any direct information from the beneficiary, on July 15, 2023, the importance of obtaining his perspective or opinion, or some expression of his wishes, was communicated to his representation. Communications from 2024 and 2025 have had the signature and participation of “Alejandro”.

B. Information provided by the State

7. In its reports of March 14 and July 21, 2016, the State reported that, at a meeting on July 1, 2015, the Office of the Attorney General (PGR), the CEAV, and the Ministry of the Interior (SEGOB) agreed to adopt measures in favor of the beneficiaries. On July 6, 2015, in a meeting with the beneficiary and his representation, a plan was agreed upon to evacuate his relatives from Michoacán, as well as to ensure their safety and health. Telephone lines and equipment with an immediate response application (panic buttons) were delivered on July 7 and 24, and August 1, 2015. Moreover, food and lodging were provided in Mexico City on July 7 and 23, 2015. It was indicated that, on August 4, 2015, social programs were made available in the Federal District. On August 13, 2015, at a concertation meeting, it was agreed upon to provide transportation, guarantee a location where they could take shelter, provide panic buttons, and arrange for legal advice and health care. Issues such as document recovery, access to education, and availability of social and productive programs were also addressed. On August 18, 2015, a credit card was provided to purchase food, clothing, and

⁶ IACHR Resolution 47/2015, Extension of Precautionary Measure No. 251-15, Matter of “Alejandro” et al. regarding Mexico, December 2, 2015 (Only available in Spanish).

⁷ The institution requested that the identities of the individuals involved in this case be kept confidential.

basic consumer products, and birth certificates and personal documents were handed out. On August 18, a safe shelter was provided outside the area of risk, with all necessary services for accommodation and security.

8. After coordinating with representation on August 20 and September 24, 2015, a helicopter was deployed to transport the beneficiary's family to the shelter. On October 12, 2015, an extension of the safe haven was granted, including resources necessary to meet basic needs. It was reported that "Alejandro" and nine other individuals were staying at the shelter, several of whom were not beneficiaries, and that damage had been caused to the building. The situation was reported to the representation, who assured they would collaborate with the withdrawal of non-beneficiaries. The SEGOB reminded the beneficiary of the rules of conduct (no visitors; must remain in the shelter; must keep a low profile). At a meeting on October 6, 2015, the rules were reiterated.

9. At a meeting on February 23, 2016, following the beneficiary's intention to return to Michoacán, SEGOB informed him that there was a current, real, and imminent risk, and that if he left the shelter, it would not be possible to ensure his safety. The State added that, at the same meeting, it was informed that his mother and two brothers had returned to Michoacán without prior notice. On February 26, 2016, the CEAV announced that abandoning the measure regarding the shelter would jeopardize the integrity of the protection plan and the safety of the victim and his family unit. The SEGOB expressed its willingness to allow family members to return to the shelter and requested that they report these situations, as they constituted a failure to comply with the measures.

10. Due to the risk that the shelter's location may have been compromised, on March 14, 2016, Mexico reported that a request was made to reinforce the perimeter security of the shelter and, on March 26, 2016, the process of moving to a new shelter in a different area began. In April 2016, it was revealed that one of the panic buttons had not been activated for 57 days. On April 19, 2016, another concertation meeting was held, during which "Alejandro" insisted on his request to return to Michoacán. The State added that on April 27, 2016, "Alejandro" informed the CEAV of his decision to return to Michoacán, and stated that he would leave on April 30, 2016, and his family would return to Mexico City. At a concertation meeting on April 28, 2016, the beneficiary confirmed his desire to return to Michoacán, and the SEGOB reiterated the consequences of this decision.

11. Mexico added that on May 6, 2016, it became known that an online magazine had published an article in which the beneficiary told his story and disclosed confidential information about his protection detail. On June 1, 2016, the CEAV informed the SEGOB that "Alejandro" would be traveling to Michoacán that day and reiterated the warning of the risk. On June 6, 2016, "Alejandro" told the CEAV that he was in Michoacán, but did not give information on his exact location. Meanwhile, the panic button report showed that they had not been turned on for 19 and 41 days. The State claimed that it could not hold a person in a shelter against their will. However, abandoning the location without notifying the authorities and without using security devices increased the level of risk and prevented the authorities from implementing precautionary measures.

12. On October 10, 2022, the State reiterated that the shelter remained in effect, and offered monthly cards for food and cleaning supplies. Help buttons were delivered to "Alejandro" and his mother on March 19, 2020, and to his brother "S" on May 12, 2020. It was reported that the National Human Rights Commission (CNDH) had issued a recommendation in which it considered "Alejandro" to be a victim. For this reason, the CEAV provided him with financial compensation, legal representation, and referred him to various institutions to address his needs. The State asserted that, despite the recommendations issued by the SEGOB, in 2021 and 2022 "Alejandro" had moved to Michoacán, where he was originally based. The State also reported a series of events that showed how the beneficiary was using the protection plan to his advantage:

- a. During 2019: In July, "Alejandro" repeatedly denied entry to personnel from the company that provided shelter services, or forced them to leave the premises, despite them arriving at the agreed time. On August 22, "Alejandro" reported that federal police officers had been apprehended and that he was being actively pursued with the intent to kill him. On the same day, the

authorities corroborated that there were no police officers held in Michoacán. On August 26, there was a concertation meeting during which “Alejandro” acted hostilely toward the public servants in attendance and ended the meeting by aggressively leaving the room. On September 2, the service provider reported calls from the beneficiary using insulting and threatening language, and included various complaints and threats.⁸ On September 3, the SEGOB urged “Alejandro” to respect the security company’s personnel and to use security measures appropriately, and informed him that any aggression would be reported to the authorities.

- b. During 2020: On March 17, in a concertation meeting, “Alejandro” expressed his desire to return to Michoacán to market avocados, and requested security measures. At the meeting, the following was agreed: send the results of the risk assessment via email; send contact details for the authorities; request two help buttons and explore whether a third could be provided; seek a date to carry out maintenance work at the shelter; and that the company facilitate the identification of personnel and the dates and times of the work. The communications were sent, the panic buttons were requested, and maintenance work was carried out, but “the beneficiary continued to behave in a hostile manner towards the security company’s staff which affected the provision of services such as gas refills, repairs, etc.” On April 1 and May 6, “S” requested to be lodged at different shelters, stating that “Alejandro” was violent and created significant tension for his mother. In October, “Alejandro” received orthopedic and ophthalmological care.
- c. During 2021: On August 2, there was a concertation meeting to review the separation of shelters. It was agreed to explore alternative arrangements for different lodgings and to find options for “Alejandro” to freely express his religious views. Various advances in the commitments were reported.
- d. During 2022: In January, “S” reported that “Alejandro” was at a “location” receiving psychiatric and psychological care in Michoacán, and that he was experiencing discomfort from shrapnel in his body. On January 19, a concertation meeting was held, during which it was agreed that the CEAV would go to the location where “Alejandro” was being held and arranged for him to receive medical attention.

13. In addition to the previous point, the State reported several incidents that took place in 2020 and 2021:

- a. On May 4, 2020, “Alejandro” was approached by police officers in Mexico City, who requested that he identify himself, but he did not have any form of identification on him. The SEGOB communicated the situation and provided an explanation, facilitating his release. At that time, the beneficiary requested security agents to transport “large amounts of money” because he was selling face masks. The request was not approved as it was not related to the measures, and he was also informed of the risk of transporting large amounts of money. He added that “he would not be stopped by [them],” that he was going to travel to several locations in Mexico, and that he was recording the call.
- b. On June 19, 2020, “S” reported that “Alejandro” was in a park just a few blocks from the shelter when state police officers confiscated two cell phones and 1,000 Mexican pesos from him, then proceeded to beat him. The assault only stopped when “S” arrived after hearing his screams. They returned his belongings and let him go. It was recommended to file a complaint, to which they responded that they would discuss it among themselves.
- c. On April 3, 2021, while “Alejandro” was in Michoacán, “several armed individuals arrived” at his place of lodging and he pressed the panic button, indicating that the button had been lost that day. No complaint was filed for the missing panic button despite being required to do so.
- d. On May 4, 2021, the vehicle in which “Alejandro” was traveling in Tancítaro, Michoacán, was hit by two bullets. The company responsible for security measures recalled that he had already been notified that the location is a high-risk area and that his security detail was based in Mexico City. He received first aid and the company continued to monitor him closely, maintaining constant communication and tracking his location via *WhatsApp*. The report highlights that the last three incidents took place in Michoacán and, given the beneficiary’s refusal to return to Mexico City, support was offered by the Michoacán Public Security Secretariat. The Prosecutor’s Office opened an investigation folder for the facts.

⁸ The following claims were specified: “1. The reason for which the gas service was supplied without their authorization. He stated that if it happens again without his express authorization, he will not be held responsible for what may happen to the personnel who enter the residence, and that he holds us responsible for anything that may happen to him. 2. A request was made to replace mattresses, which were already in storage, but the beneficiary said he will not allow staff access. 3. Communication was received from the beneficiary indicating that there was an issue with the stove. He demanded the telephone number of the owner of the property. He was informed that all services are coordinated by the company and that an appointment is required to enter the shelter to perform preventive and corrective maintenance, as requested. The beneficiary got upset and reiterated that he was not responsible for the safety of people entering the premises. “We would like to inform you that the beneficiary exhibits aggressive and violent behavior. He does not allow access to the shelter, and from his comments, he leads us to think that he may carry out inappropriate activities.”

- e. On October 6, 2021, “S” activated the panic button and reported that ministerial police officers followed him, stopped him, and took one of his brothers, but refused to specify who. “S” then proceeded to cancel the request for assistance.
- f. On October 8, 2021, “Alejandro” activated the panic button in Apatzingán, Michoacán. “Alejandro” subsequently replied that he was okay, and it was false activation of the panic button.
- g. On October 9, “Alejandro” reported that one of his brothers “was taken by four individuals who got out of a taxi.” They contacted “S”, who indicated that it was another brother, but he did not want to file a report. He did not want to specify which brother was involved, only that he was in Michoacán with “Alejandro”. After several calls, “Alejandro” responded and cancelled the call for help.
- h. On October 14, 2021, “Alejandro” reported that “S” and his mother had COVID-19. In the early hours of the morning, his mother was treated at the hospital and it was announced that she would be taken to Michoacán and that “S” would remain in Mexico City. On the same day, they reported that “one of their brothers” had been detained by agents of the Office of the State Attorney General in Apatzingán, who “had beaten, stripped, and searched their brother for bullet wounds like the ones ‘Alejandro’ had.”

14. The State added that the beneficiary was constantly informed of the limits of the security measures. In 2020, the beneficiary called SEGOB staff and told them that if he did not receive protection during his trips to Michoacán, he would “take up arms in Michoacán or reestablish the self-defense groups in that state.” It was explained to him that both of these measures were illegal. In addition, the beneficiary mentioned the full name of the official who was assisting him and other details in a tone that suggested he was recording the conversation and documenting who he was speaking to. At the same time, “Alejandro” stated that if he was not provided with security, he would relocate to Michoacán with his family, as he had the means to support himself, but he needed protection. It was reported that “Alejandro” made trips outside the security protocol area between 2020 and 2021.⁹ The beneficiary added that, due to his protection measures, the State has to “invest or spend on the security he requires,” or he will not “stop what he is doing.”

15. The State clarified that, on September 22, 2020, “Alejandro” informed an institution, among other things, that he was “considering meeting with organized crime groups” and intended to request “protective measures to travel to Michoacán and speak with the communities, which are under the control of criminal organizations.” He was informed that no support will be provided for accompaniment that could result in illegal activities. Also in September 2020, “Alejandro” informed another institution of the disappearance of one of his brothers (not a beneficiary of these precautionary measures) in Michoacán, for which proceedings were initiated. “Alejandro” also addressed the disappearance of the couple and their son (who are not beneficiaries of these precautionary measures) in June 2021, in Michoacán. The SEGOB provided support to the process along with the Michoacán Commission for the Search for Missing Persons (CBPM), but respected their wish to not file a formal complaint. After several inquiries, on August 26, 2021, “Alejandro” reported that he had communicated with his partner via *Facebook* and that “she had confirmed that it was her, but that for safety reasons she had not told him where they were. That is what she wants, for safety reasons. She voluntarily left for her own safety and that of her child.” The CBPM contacted her, confirming “that both she and her son are okay.”

16. The State emphasized the importance of the beneficiary complying with the psychiatric treatment offered by the CEAV, noting that, according to psychological staff, he was exhibiting symptoms of potentially irreversible post-traumatic stress disorder that require treatment to stabilize his condition. He also claimed that his relationship with his family had deteriorated and that he felt the authorities wanted to harm him. He requested bodyguards, another shelter, to return to Michoacán, and an armored vehicle, despite the fact that his claims have not been substantiated. The State added that no risk had arisen from the events that originally led to the granting of the protection measures, and that many of the reported situations were caused by the beneficiary himself, as a consequence of his decision to relocate to a high-risk area.

⁹ On June 22, 2020, to Apatzingán and Morelia. On August 5, 2020, to Tancítaro, Michoacán. On September 3, 2021, he requested to relocate from Mexico City to Michoacán. On September 17, 2021, he stated that he was going to relocate to Tacámbaro, Michoacán.

17. In the report from April 19, 2023, the State updated that a concertation meeting had taken place on February 24, 2023. Following the meeting, on March 22, 2023, “Alejandro” was taken to the National Institute of Psychiatry along with his brother “S”. It was determined that “he did not meet the requirements for hospitalization, and he was offered a schedule of medical appointments in the psychiatry department, which he has not attended of his own volition.” CEAV staff has gone to his residence to provide accompaniment, but he has refused. This occurred at the request of a family member, in relation to a “psychotic episode,” after which the shelter owner demanded the cancellation of the contract. The service provider had to relocate him to the State of Mexico. It was added that on March 28, 2023, “Alejandro” asked to see the President of Mexico “pointing out situations and apologies regarding the coming of Christ, the Antichrist, and the apocalypse”; screenshots of the messages were provided. Mexico reiterated that “in recent years there have been no incidents of risk” and that the circumstances described by the beneficiary are “metaphysical.” It was added that “Alejandro” continued to receive comprehensive care from the CEAV, as he had been recognized as a victim. He therefore received constant care and support outside the framework of precautionary measures, and they requested that they be lifted.

18. On September 13, 2024, the State responded to an allegation of lack of medical care due to “not knowing Mexico City,” clarifying that medical personnel had gone to his residence on March 23, 2023 to provide appropriate assistance, but “Alejandro” refused to leave his residence. It was indicated that the CEAV managed appointments and, if transfers were required, they could be requested to review their relevance. A list of 15 appointments arranged for “Alejandro” between January 2022 and May 2024 was provided, covering both physical and mental health care. Several of these appointments were missed, highlighting that he has not adhered to the psychiatric treatment prescribed by medical institutions. Moreover, the list of managed care appointments for “S”, as well as for his mother, was provided. It was clarified that the CEAV had no pending requests for medical care and that, with the beneficiaries’ consent, any necessary referrals could be made. It was also specified that they are registered in the National Registry of Victims. Regarding security measures, it was reported that patrols were being carried out at the shelter by the Security Secretariat of the state of Mexico. One unit and three officers were assigned to this task, and no incidents have been reported.

19. In relation to the proceedings for the events of 2015, it was added that in 2019, criminal action was initiated, and the case was currently at the investigation stage. Meanwhile, reports of issues at the shelter were addressed, assistance buttons had been operational without incident since 2020, and financial support for food was in place. In turn, it was shared that concertation meetings had been held since 2015 and that, at the end of 2022 and 2023, proposals for new meetings had been made but had not been accepted by the beneficiary. In this regard, it was claimed that there had been complications in communication with the beneficiary, who had engaged in “conflictive, aggressive, and even threatening situations” with personnel from the SEGOB, the security company, and other institutions. In addition, it was stated that many of the situations have been caused by the beneficiary travelling to an area that may represent a danger to them. They again requested that the measures be lifted.

C. Information provided by the representation

20. On February 24 and April 21, 2016, the applicant organization waived the representation and provided contact details of the CEAV, who would exert representation before the Commission from that moment on. On July 5, 2019, it was reported that on June 8, 2019, “S” was kidnapped at the Indios Verdes metro station in Mexico City and later found “badly beaten on the highway in Uruapan, Michoacán, where his captors threw him out of the car.” The facts were reported to the SEGOB on June 9, 2019. “Alejandro” stated that “S” had already been taken to a secure location and was being looked after by trusted personnel. “Alejandro” demanded an operation from the SEGOB to evacuate his brother, but since it was denied, “S” took shelter in Michoacán with people he trusts. According to reports, the purpose was to intimidate “Alejandro” “so that he would drop the investigation against members of the Federal Police, who are suspected of attempting to murder him” on January 6, 2015.

21. On March 13, 2022, the representative institution reported that the criminal case regarding the events of January 6, 2015 was in the preliminary investigation stage and that six individuals had been detained as suspects. It was reported that, at the request of “S,” the CEAV Comprehensive Care Center (CAI) in Michoacán arranged for his mother to receive care at a local hospital for complications from COVID-19 on October 21, 2021. The care was authorized immediately but rejected by the beneficiary for fear of being intubated. On that occasion, according to reports, “S” threatened hospital staff with consequences if his mother’s condition worsened or if any serious complications arose. He also demanded that medical care be provided at his residence, yet refused to disclose his address. Upon revealing his address, a mobile unit with medical personnel was dispatched on October 22. Upon arrival, they found “S” and his mother at the residence, but “S” told them that his mother was not there and denied them access. At night, medical personnel returned to the residence and were able to access his mother, who had a low glucose level and no symptoms of COVID-19. She was provided with medical attention, along with the physician’s contact information in case she required further care.

22. It was reported that the CAI in Michoacán had offered psychological and psychiatric care to “Alejandro,” after learning that he was in Apatzingán, Michoacán. In this regard, “S” informed the CEAV that he had admitted his brother to an addiction treatment center, as it was the only one that would take him, and he was accepted because he knew the director. “S” did not disclose any additional information regarding the location or whereabouts of “Alejandro”. On January 22, 2022, arrangements were made to offer psychiatric and psychological care to “Alejandro” at the local hospital and the nearest psychiatric hospital. “S” shared that “Alejandro” refused to go to the hospital and demanded that medical personnel be sent to where he was being treated. However, he could not authorize hospital personnel to treat him outside the facility, and the addiction center would not allow them inside. Health authorities offered alternatives to make “Alejandro” feel comfortable, but the options were rejected. Subsequently, “S” requested medical treatment for “Alejandro’s” shrapnel wounds. He was asked to specify the time of their arrival at the hospital to ensure that appropriate medical personnel would be available. It was further reported that on January 25, 2022, “Alejandro” went to the local hospital for a medical evaluation, accompanied by the director of the addiction center. He was found to be in “stable condition and reported that shrapnel had been observed in his chest, pelvis, and legs. The physician indicated that there were no life-threatening alterations in function.” It was also stated that “all the shrapnel fragments are superficial and are not medically removed from the body, as they do not pose a risk to life or the function of organs or limbs.” In addition, a psychiatric appointment was scheduled for January 31, 2022, and a psychology appointment for March 11, 2022. The latter was rejected because “he is already being treated by a psychologist.” It was added that, according to information provided by the CAI Michoacán, “S” called them and demanded that the CEAV cover the expenses of the rehabilitation center where “Alejandro” was staying and that “if they did not, he would protest and ‘take over’ the offices of the [CEAV] in Mexico City and the [CAI] offices in Michoacán.” It was specified that it could not be covered under the relevant law.

23. On May 31, 2024, “Alejandro” sent a communication and requested that recent documents be forwarded. On July 11, 2024, he submitted his observations regarding the events of January 6, 2015, as well as his removal and subsequent placement in an accommodation to take shelter which is “453 kilometers” from his place of origin. He added that a year earlier, he had been transferred to the state of Mexico. Regarding the availability of psychiatric care, “Alejandro” stated that this was not agreed with him and that he did not refuse to receive care, but he had difficulties traveling and accessing treatment. He added that the CEAV provided him with transportation “on only two occasions.” “Alejandro” stated that he wanted to receive medical attention to determine what could be done about the shrapnel in his head, which continued to cause him pain. It was argued that the precautionary measures are mandatory, despite the obstacles that the State reported in their implementation. In this regard, he questioned the State’s request to the lifting of the measures, “citing an alleged refusal to receive medical care and [...] alleged misconduct on [his] part, as if compliance with these precautionary measures were conditional on these acts.” It was noted that in July 2023, the applicants received a notification from the SEGOB stating that, since the risk factors from 2015 were no longer present, the measure regarding the shelter would be terminated as of July 31. The beneficiaries were instructed to vacate the

residence by August 1, 2023, at the latest. However, the panic buttons and security patrols at the specified address would remain in place. The beneficiary questioned that this had been determined without conducting a risk assessment in consultation with him and, given that he disagreed with the decision, he filed an appeal for protection of constitutional rights (*amparo*). On July 31, 2023, a federal judge granted a suspension of action which halted the termination of measures regarding the accommodation used as a shelter. On February 12, 2024, an appeal for protection of constitutional rights (*amparo*) was granted and ordered that a petition be filed with the IACHR for a resolution of the matter. The SEGOB filed a motion for review against the ruling, which is pending. The beneficiary stated that it was false to claim that no events that have placed them at risk have occurred, as the SEGOB has directly warned him that Tancítaro, Michoacán, is a high-risk area for his safety and well-being. He further added that the accommodation acting as a shelter ensured their safety, which is not the case in Tancítaro. It was added that, in early 2023, one of his brothers who was in Tancítaro, Michoacán “was wounded by a weapon at the hands of members of organized crime”, but there are no further details of the event. It was added that his brother was immediately taken to a clinic and received medical treatment, and that he decided not to report the incident for fear of reprisals.

24. On September 13, 2024, the representation added that, in 2023, the individual who was wounded by a firearm was A.R.E., aged 33 (not a beneficiary). It was added that family members of “Alejandro” had observed vehicles parked outside the shelter, along with individuals who “have behaved suspiciously and kept looking at the building.” It was stated that the measure regarding accommodation kept them safe and secure from situations that placed them at risk. It was also argued that being subjected to internal forced displacement should be considered an act of risk, as should the public information that ranked Michoacán as one of the most violent states in the country. The applicants therefore requested a risk assessment and a safe return plan. Additionally, they observed that in 2024, a hearing was held in the criminal proceedings related to the events of 2015. Regarding the allegations concerning the lack of protection during his numerous trips to Michoacán, reference was made to the right to freedom of movement and to choose one’s place of residence.

25. On February 17, 2025, the events that took place in 2015 in Apatzingán, Michoacán, were summarized. It was stated that “Alejandro” did not refuse treatment or medical attention, and he demanded to know what would happen to the shrapnel in his body. He reported that he received medical attention in March 2023, and a follow-up appointment was scheduled for September 2024. At that time, it was agreed that he would be transported, but no one arrived to take him, so he was unable to attend the appointment. It was stated that “Alejandro” did not object to receiving medical attention and that it could be provided at the accommodation where he was sheltered. It was confirmed that the shelter was still available and that calls regarding the needs arising in the shelter had been answered. The shelter kept the beneficiaries safe, which was not the case in Tancítaro, Michoacán. The representation reported that when any of the beneficiaries communicate with them, the requests are sent to the SEGOB. Meanwhile, poor internet reception was reported on the panic button used by “S” and his mother inside the accommodation. It was also stated that there have been no incidents of conflict, aggression, or threats from “Alejandro” toward authorities or their representation. Additionally, during an inspection on April 18, 2024, employees from the company providing security services went to make repairs and reported that they have not experienced any mistreatment from “Alejandro.” It was questioned that the SEGOB had attempted to withdraw the measure regarding the accommodation offering shelter without carrying out a risk assessment for the beneficiaries. At the same time, it was asserted that the risk persists, as the threats in 2015 were made by state agents and the criminal group “Los Caballeros Templarios.” In this regard, a list of links to news articles was attached that “report on the presence of this group in the area” of Michoacán. It was also alleged that no risk assessment had been carried out to conclude that individuals could return to their places of residence without reprisals. Lastly, photographs were shared of the beneficiary “Paco,” showing a scar on the back of his neck where shrapnel had been removed.

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

26. 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.

27. 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.¹⁰ Regarding the protective nature, these measures seek to avoid irreparable harm and to protect the exercise of human rights.¹¹ 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.¹² 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.

28. 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.

¹⁰ Inter-American Court of Human Rights (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.

¹¹ 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).

¹² 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).

29. 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.¹³ In this sense, when no imminent risk is identified, the burden of proof and argument increases over time.¹⁴ 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.¹⁵

30. Similarly, the Commission reiterates that, by its own mandate, it is not within its purview 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.¹⁶ This is better suited to be carried out by the Petition and Case system. The following analysis refers exclusively to the requirements of Article 25 of its Rules of Procedure, which can be resolved without making any determination on the merits.¹⁷

31. As a *preliminary matter*, the Commission considers the *identities of the beneficiaries*, in accordance with Article 25 of its Rules of Procedure. Although it is possible to keep their identity confidential in public documents, it is required to disclose their identity to the State.¹⁸ Therefore, these measures were initially granted in favor of “Alejandro,” his mother, and four siblings. However, only the identification of “S” was provided, and the proper identification of the other three siblings was not submitted, despite indications that it would be provided (see Footnotes 2 and 3). Regarding the extension in favor of “Paco” and “José”, both individuals were identified (Footnote 5). Notwithstanding this obstacle, it is noted that during the time these precautionary measures were in force, information was only provided regarding “Alejandro”, his mother, “S”, and “Paco”. Although reference was made to situations involving other siblings, the beneficiaries have refused to identify them. In this regard, the following analysis will be carried out based on the foregoing.

32. In analyzing whether the procedural requirements continue to be met, the Commission emphasizes that the aim of this proceeding is to protect the life, integrity, and health of “Alejandro” and his identified family members through the adoption of concerted measures and the investigation of the events that gave rise to the precautionary measures.¹⁹ Based on the information provided in the case file, the Commission observes the following:

a. Regarding the protection measures:

- i. The beneficiaries were evacuated from Michoacán by state agents via helicopter. They were then transferred to Mexico City, where they were provided with food and temporary accommodation. They received support via personal documentation, legal advice, and availability of social and productive programs. The IACHR noted that the evacuation was an immediate measure in response to the

¹³ I/A Court H.R., [Case of Fernandez Ortega et al.](#), Provisional Measures regarding Mexico, Order of February 7, 2017, considerandums 16 and 17 (Available only in Spanish).

¹⁴ I/A Court H.R., [Case of Fernandez Ortega et al.](#), previously cited, considerandums 16 and 17.

¹⁵ I/A Court H.R., [Case of Fernandez Ortega et al.](#), previously cited, considerandums 16 and 17.

¹⁶ 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.

¹⁷ 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).

¹⁸ See in this regard: IACHR, [Informational Booklet on Precautionary Measures](#), 18. Can I send confidential information or request that the IACHR keep certain information confidential?

¹⁹ IACHR, Resolution 23/2015, previously cited.

situation of risk that the beneficiaries were facing, which was requested by the beneficiaries themselves.

- ii. Shelter was guaranteed with all services and security in Mexico City since August 2015, which included financial support for food and necessary supplies. On October 12, 2015, the shelter was expanded to include new beneficiaries. Faced with the possible disclosure of his location, he was relocated to another area in March 2016. In 2023, he relocated again, this time to the state of Mexico, allegedly due to an incident that led the property owner to request termination of the contract. Police patrols were also provided at the shelter and personnel were assigned to this task. The Commission observes that the measure regarding the shelter was consensual and agreed upon by the beneficiaries, even though they were aware of the requirements and conduct that it required. It is positively noted that, despite the repeated relocation of the beneficiaries to Michoacán for extended periods, the shelter has been maintained. In addition, the necessary repairs and upkeep have been carried out to ensure its habitability. Thus, without prejudicing the desire to relocate to Michoacán, a safe space has been provided for the beneficiaries.
- iii. Panic buttons were distributed and the beneficiaries have used them on numerous occasions. There are records of assistance provided by the security company and the SEGOB, requests for and provision of support from the National Guard and contacts with local police. In addition, the liaison and support of the Secretariat of Public Security of Michoacán has been offered. It should be noted that this has allowed the beneficiaries to be relocated to a safe location when necessary and has facilitated the resolution of any issues with the authorities in contact with them.
- iv. Taking into account the information provided by the State regarding alleged misuse of the shelter and various records of false panic button activations, the Commission reiterates that security measures must fulfill their purpose of protecting beneficiaries. In that sense, any use that goes against this purpose may imply changing the nature of the security measures.²⁰ The IACHR emphasizes that the correct use of security measures is essential to ensure their effectiveness, highlighting that the measures were implemented based on risk assessments carried out by specialized institutions and were regularly updated.²¹ The IACHR recalls that “the beneficiaries and their representation fully collaborate to promote [the] effective implementation” of the safety measures.²²

b. Access to medical care:

- i. Psychiatric and psychological care has been made available to “Alejandro” on several occasions, as deemed necessary by psychologists from state institutions, and in response to behavior that both authorities and family members have reported. It is positively noted that care and treatment have been provided without imposing compulsory hospitalization or treatment against their will.
- ii. Regarding the discomfort caused by the shrapnel in “Alejandro’s” body, a medical consultation took place on January 25, 2022. The physician concluded that “all the shrapnel is superficial and is not medically removed from the body, as it does not pose a risk to life or to the function of organs or limbs.” However, it is noted that “Alejandro” continues to express that he does not know what will happen to

²⁰ IACHR Follow-up Resolution 88-21, Precautionary Measure No. 405-09 and 112-16, Berta Isabel Cáceres, her family unit, members of COPINH, et al. regarding Honduras, November 15, 2021, para. 76.

²¹ IACHR, [Towards Effective Integral Protection Policies for Human Rights Defenders](#), OAS/Ser.L/V/II., Doc. 207/17, December 29, 2017, paras. 263, 264, 281, 299 and 333; IACHR, [Second Report on the Situation of Human Rights Defenders in the Americas](#), OEA/Ser.L/V/II., Doc. 66, December 31, 2011, paras. 456-460.

²² IACHR, Second Report on the Situation of Human Rights Defenders..., previously cited, para. 439; I/A Court H.R., [Mapiripán Massacre Case regarding Colombia](#), Provisional Measures, Order of September 2, 2010, considerandum 20 (Available only in Spanish).

the shrapnel and that the pain persisted. In this regard, it is important that the matter be examined once again by medical specialists and that the medical findings be communicated to the beneficiary. However, from the information provided, the Commission does not find that there was a refusal to provide medical care or that the care provided was not appropriate to the beneficiary's health condition.

- iii. Medical care was provided to "Alejandro's" mother due to possible complications from COVID-19 in 2021. Additionally, it was noted that during 2022 and 2024, a total of 15 medical appointments were arranged for "Alejandro," along with others for "S" and his mother, and there were no pending requests at that time.
- iv. The Commission observes that the beneficiaries have received medical assistance both in Mexico City and in Michoacán, including at their residences and/or via arranged transportation. In addition, it was recently stated that shards were removed from the body of "Paco". The IACHR warns that the CEAV is providing assistance and services to the victims due to their status as victims at the domestic level, which is understood to continue without prejudice to the precautionary measures.

c. Concertation actions:

- o Concertation meetings have taken place with the representation and the beneficiaries on the following dates: July 1 and 6, August 13 and 20, and October 6, 2015; February 23, April 28, 2016; August 26, 2019; March 17, 2020; August 2, 2021; January 19, 2022, and February 24, 2023. In line with the above, open channels of communication have been maintained with the beneficiaries and their primary representation, through which the CEAV channels requests for assistance to the SEGOB and the relevant institutions. This has proven useful for reporting needs or challenges in the implementation of these measures, as well as for reminding beneficiaries of the rules for participating in protection programs and alerting them to any alleged misuse of the measures.
- i. The Commission takes note of the State's claims concerning incidents in which "Alejandro" or "S" allegedly acted in a threatening or disrespectful manner toward individuals, including SEGOB officials, medical personnel, and employees of the security service provider. In addition, on at least two occasions, "Alejandro" has disclosed confidential information essential for his protection in the media. In this regard, the Commission reiterates the importance of the beneficiaries' cooperation in the implementation of the measures and recalls that "only through stable, respectful, and constructive dialogue will the beneficiary and authorities be able to overcome the challenges that arise throughout the lifespan of the measures."²³
- ii. In any event, the Commission considers that, in order for the precautionary measures to achieve their objective, the participation of both parties in the implementation process is required. This process, in turn, requires a space for respectful and constructive dialogue aimed at protecting beneficiaries,²⁴ where discrepancies can be raised without jeopardizing the protection plan itself or the relationship between the parties.

²³ IACHR, [Towards Effective Integral Protection Policies for Human Rights Defenders](#), previously cited, para. 282.

²⁴ IACHR, Follow-up and Extension Resolution 53-24, Precautionary Measure No. 395-18, Authorities and members of the Gonzaya (Buenavista) and Po Piyuya (Santa Cruz de Piñuña Blanco) Resguardos of the Siona People (ZioBain) regarding Colombia, August 21, 2024, para. 53. "In order for the consultation spaces to fulfill their purpose, the willingness of all the parties involved is required. For this reason, it is important to have a space for mutual communication with a view to advancing an understanding towards the protection of beneficiaries." (Available only in Spanish)

d. Investigation of threatening events:

- i. With regard to the events of January 6, 2015, in Apatzingán, Michoacán, the most recent information indicates that criminal proceedings were initiated in 2019 and remain in the preliminary investigation stage, with six individuals detained as suspects. Furthermore, the Commission notes that most of the events reported during the time these precautionary measures were in force were not issued as formal complaints, including those related to assaults by state agents or alleged disappearances.

e. Ongoing risk:

- i. The IACHR observes that most of the reported incidents lacked specific details regarding the time, manner, and location in which they occurred. In some instances, not even the identity of the alleged victim or affected individual was disclosed, or the request for assistance was subsequently withdrawn. The Commission recalls that, although the facts do not need to be sufficiently proven, in order to assess the procedural requirements, it is necessary to provide a minimum of detail of the reported risk.
- ii. For its part, the desire and conformity of the beneficiaries in relation to the measures implemented and their place of residence is noted. However, the IACHR notes that, despite warnings from the authorities about the level of risk involved in moving to Michoacán, which “Alejandro” himself pointed out in his latest communications, most of the events that places the beneficiaries at risk took place during his voluntary residence in that state, while he had access to shelter.
- iii. There is also no information on the activities that beneficiaries allegedly carry out in Michoacán. The IACHR expresses its concern regarding repeated allegations of kidnapping federal police officers, taking up arms, mobilizing local residents, meeting with organized crime groups, and seizing institutions, among others. In this vein, the Commission calls attention to any activity that could be related to criminal activities or incitement to violence, recalling that precautionary measures do not preclude compliance with national legislation or criminal responsibility that may be determined by the competent authorities at the domestic level.
- iv. Based on the information available, the IACHR observes: (i) the lack of detailed information regarding the incidents involving the beneficiaries; (ii) at times, contradictory or unverifiable statements, as well as the repeated cancellation of requests for support without explanation; and (iii) the absence of formal complaints. Furthermore, approximately ten years have passed since the events that led to the adoption of these measures. In these circumstances, it is not possible to assess the scope of the information provided in relation to a specific and current risk situation.

33. In addition to the previous analysis, the Commission draws particular attention to the work carried out by the CEAV in supporting the beneficiaries, who have been declared victims in domestic proceedings as a result of their registration in the National Victims’ Registry, which is independent of the current international procedure. In this regard, it is positively noted that this involves continued support for the beneficiaries in addressing their needs, as deemed appropriate by the institution, in accordance with relevant legislation and based on the determinations of specialists in the respective fields.

34. In evaluating compliance with the procedural requirements, considering the assessment that was carried out, the Commission finds that the factual situation regarding “Alejandro” and his family members has changed. In particular, it has not identified any situation that places them at risk, and the necessary protection and medical care measures have been provided to the beneficiaries. In assessing the current situation that places the beneficiaries at risk, the IACHR takes into account the statements issued in the most recent submissions by the representation, indicating that residing outside of the Michoacán area has kept them

safe. It also recalls the existence of a dangerous context and the continued presence of the aggressor group from 2015. Therefore, the Commission relies on the beneficiaries' cooperation in the proper use and compliance with any measures that are decided to be maintained. In this regard, the IACHR acknowledges the efforts made by the Mexican authorities to comply with this precautionary measure and to continue their efforts to hold consultation forums, even in light of the challenges reported in the communication.

35. Considering the nature of the precautionary measures mechanism, based on the information available, and the analysis carried out, the Commission understands that, to date, that it has no elements to support compliance with the requirements of Article 25 of its Rules of Procedure. Given the above, and taking into account the exceptional and temporary nature of precautionary measures,²⁵ the Commission considers that it is appropriate to lift these measures.

36. 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 Mexico to respect and guarantee the rights recognized therein. In this way, it reminds Mexico that "if the conditions of risk to life and integrity do not subsist, neither do the reasons to keep them in force," which is why it is important that the internal authorities carry out a risk assessment, if there is the participation and collaboration of the beneficiaries, before deciding on the permanence of the protection measures.²⁶

V. DECISION

37. The Commission decides to lift the precautionary measures granted to "Alejandro" and his family members,²⁷ in Mexico.

38. 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 exists a situation presenting a risk that meets the requirements set forth in Article 25 of the Rules of Procedure.

39. The Commission instructs its Executive Secretariat to notify this resolution to the State of Mexico and to the representation.

40. Approved on May 11, 2025, by Andrea Pochak, First Vice-President; Arif Bulkan, Second Vice-President; Carlos Bernal Pulido; and Gloria Monique de Mees, members of the IACHR.

Tania Reneaum Panszi
Executive Secretary

²⁵ 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).

²⁶ IACHR, [Resolution 9/24](#), Precautionary Measure No. 519-17, Eduardo Valencia Castellanos regarding Mexico, March 6, 2024, para. 35; [Resolution 20/2024](#), Precautionary Measure No. 887-19, Families of the Nueva Austria del Sira Community regarding Peru, April 10, 2024, para. 36; [Second report on the Situation of Human Rights Defenders in the Americas](#) December 31, 2011, OEA/Ser.L/V/II. Doc. 66, paras. 529, 531.

²⁷ Which include his mother, "S," three additional siblings, "Paco" and "José," as indicated in the resolutions to grant dated June 30, 2015, and the extension of December 2, 2015.